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4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

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11 DEPOSITION OF: JEREMY BERTINO

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15 Tuesday, April 26, 2022

16

17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:20

21 a.m.

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2     Appearances:

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5     For the SELECT COMMITTEE TO INVESTIGATE

6     THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

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8     [REDACTED], INVESTIGATIVE COUNSEL

9     [REDACTED], PROFESSIONAL STAFF MEMBER

10    [REDACTED], INVESTIGATIVE COUNSEL

11    [REDACTED], INVESTIGATIVE COUNSEL

12

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14     For JEREMY BERTINO:

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16     CHRISTOPHER A. WELLBORN

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[REDACTED] Let's go on the record at 10:20 a.m.

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4

Good morning. This is the deposition of Jeremy Bertino conducted by the House Select Committee to Investigate the January 6th Attack on the United States Capitol pursuant to House Resolution 503.

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This will be a staff-led deposition. The members may choose to join the Webex and ask questions themselves.

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At this time, I'd just ask the witness to please state your full name for the record and spell your last name.

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11

The Witness. Jeremy Bertino, Jeremy Joseph Bertino. And the last name is spelled B-e-r-t-i-n-o.

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[REDACTED] Great. And we met off the record, but my name's [REDACTED]. I'm an investigative counsel with the select committee. With me from the select committee staff is [REDACTED], who's also an investigative counsel and a lawyer with the committee.

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The other folks that you see on the Webex are official reporters and some folks that are helping out with some of the technical and logistical issues with Webex. There are no members currently in attendance at the deposition.

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And then at this time, I'll ask counsel for Mr. Bertino to state his name for the record.

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Mr. Wellborn. Sure. Christopher A. Wellborn, W-e-l-l-b-o-r-n.

[REDACTED] Great. And then under House deposition rules, neither committee members nor staff may discuss the substance of this testimony today unless the committee approves release.

25

Also note that under House rules, you may have your attorney present -- which

1     you, of course, do -- but counsel for other individuals or other attorneys from other  
2     government agencies may not be present and so there are no other attorneys present.

3             I'd also like to note for the record that what's been previously marked as exhibit 1  
4     is the select committee's February 10th, 2022, subpoena for Mr. Jeremy Bertino, and the  
5     House deposition rules were included in that exhibit and that subpoena.

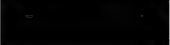
6             Just a couple kind of housekeeping rules for today.

7             There is an official reporter that's transcribing everything that we're saying. So,  
8     Mr. Bertino, if you can just wait until I finish my question before you start your response.  
9     It makes it very hard for the reporters to try to record two people at one time.

10            And then sort of on the same and on that note, also make sure that you're using  
11    verbal responses, full words as opposed to like an huh-uh or a nuh-uh or a head shake. I  
12    might remind you if I see you doing that. We all do it. I'll probably do it at some point  
13    today. But we'll just keep each other responsible there.

14            And then also throughout today, all I'm asking is for complete answers based on  
15    your best recollection. So if a question's not clear, just ask me to clarify it or restate the  
16    question. And if you don't know an answer, just feel free to say, "I don't know."

17            The Witness. Will do.

18             And then also I'll note that you may only refuse to answer a question  
19    based on a privilege that's recognized by the select committee.

20            If you refuse to answer a question based on a privilege, staff may either proceed  
21    with the deposition or seek a ruling from the chairman on the objection. If the chairman  
22    overrules such an objection, you'll be required to answer the question.

23            And then I'll also remind you -- and this is a warning that we give to every witness  
24    that we speak to -- that it's unlawful to deliberately provide false information to  
25    Congress. Providing false information could result in criminal penalties for perjury or

1 false statements.

2 And basically that statute, the false statement statute, just makes it illegal to  
3 provide a false statement to a congressional investigator like myself or [REDACTED], and  
4 I'm sure Mr. Wellborn has explained that to you.

5 Do you understand that?

6 The Witness. Yes, sir.

7 [REDACTED]. Okay. That being said, I also want to make clear that this is a  
8 congressional investigation. This is not a criminal investigation, as has been made clear  
9 from our prior communications. We are not a partner with the Department of Justice,  
10 we're not participating in each other's investigations. And I just want to make sure you  
11 understand that distinction between DOJ's investigation and ours.

12 The Witness. Yes, sir. I get it.

13 [REDACTED] And then just let me know if you need any breaks at any point for  
14 any reason, water or just to talk to Mr. Wellborn. Happy to do that. I'll try to take a  
15 break about every hour, and then we'll probably take a lunch break as well. But just let  
16 me know if you need a break at a different time.

17 The Witness. Will do. Thank you.

18 [REDACTED] And then I'll be leading most of our conversation today, but Mr.  
19 Prasanna or other staff members that join the call might have some questions for you as  
20 well. And I'll try to announce if anybody else joins the call so that you're aware of who's  
21 listening in.

22 And then last bit, because this is a deposition, you'll be under oath. So if you  
23 could please raise your right hand to be sworn.

24 The Reporter. Do you solemnly declare and affirm under the penalty of perjury  
25 that the testimony you are about to give will be the truth, the whole truth, and nothing

1 but the truth?

2 The Witness. I do.

3 [REDACTED] And then I forgot to mention, the video of this deposition is also  
4 being recorded. So if at any point we do take breaks and you need to talk to Mr.  
5 Wellborn, you should also turn off your camera just so you can maintain your privacy  
6 there.

7 The Witness. Okay.

8 EXAMINATION

9 BY [REDACTED]

10 Q All right. With that, I think I'd actually like to start with a couple quick  
11 questions about this issue with Mr. Dan Hull, who was or was not your prior counsel. Do  
12 you know who I'm talking about?

13 A Yes, sir, I do.

14 Q Okay. Can you just take me through that situation and how you came to  
15 have a first conversation with Mr. Hull and how that unfolded?

16 A Yes. So I'm going to go back in my memory and try to remember the first  
17 time that I spoke with him. I believe it was after I received a civil suit from a church. I  
18 reached out to Enrique Tarrio and said, hey, I just got this subpoena or notice of civil suit.  
19 I think I need an attorney. And he's like, oh, well, I'll talk to Dan, my attorney, and I'll  
20 see if he'll take it for you.

21 So I said okay. Couple of weeks went by, I didn't hear anything. I got back in  
22 touch with Enrique and asked him, I said, hey, have you talked to your lawyer? And  
23 he's, like, oh, yeah, Dan said he'll do it for you pro bono because you were stabbed, but  
24 he wants to talk to you.

25 And so he sent me his phone number and I called Dan. I can't remember when,

1     what date, I don't remember the specific details, but I do remember calling him and him  
2     basically asking me -- or I was asking him about representing me in the case and he said  
3     oh, sure, sure, sure, we'll get to that.

4             But he was interested in possibly having me take the stand in the Joe Biggs' trial  
5     about my stabbing to show why Joe was wearing body armor when he was in D.C.,  
6     because there was a lot of talk after I was stabbed about guys making sure you had a  
7     stabproof vest on and stuff like that.

8             So I think his original intent was to get me on board to help his client. And then  
9     the next -- I believe the next interaction I had was when I -- Jay Thaxton reached out to  
10    me and was looking for representation for his deposition. And I said, hey, give this guy  
11    Dan a call. I sent him Dan's number. And I guess Dan took care of his deposition,  
12    which I, you know, when I kind of heard what happened there, that's when I became  
13    reluctant to have him represent me in this.

14            He didn't seem very stable on the phone. I started to really listen to when he  
15    was talking and his rants, and I was, like, okay, this guy-- I don't think this guy's great for  
16    me.

17            And then the morning that the FBI raided my girlfriend's house I reached out to  
18    him because he was the only attorney that I knew and I was just kind of asking him for  
19    advice on how to handle everything.

20            And I specifically asked him for a retainer, like, can we sign a retainer paperwork,  
21    and he was, like, not right now, not right now. And I said okay.

22            Then a few days later, he asked -- he called me -- he would call me randomly late  
23    at night and go on, like, an hour rant about how the Proud Boys were little girls and just, I  
24    mean, off the rail conversations. I didn't know what he was talking about. I was, like,  
25    my brain was popping trying to figure out what he was talking about.

1           Then I believe he came to me and said, well, I'm going to -- he said, do you want  
2           me to accept service on your behalf for the congressional thing, he said, but I'm not going  
3           to be able to be there because that date doesn't work for me, so you're going to have to  
4           go do it on your own.

5           I said no -- and this was on a phone conversation, not a text conversation -- I said  
6           no. He's like, well, take 48 hours and think about it. This was on like a -- I don't even  
7           remember what day, but I believe it was the day before he actually accepted service from  
8           you guys. And he never got confirmation from me to accept service.

9           He said, well, just take 48 hours and think about it. I said, okay.

10          Next phone call I got from him was, hey, I accepted service, your date for your  
11          deposition is this day, and I'm not going to be there so you're going to be on your own.

12          And that is pretty much when I cut off contact, I stopped responding to his calls  
13          and his text messages, and I hired Mr. Wellborn.

14          Q    Okay. Thanks. That's a helpful explanation. Just a couple quick  
15          questions.

16          Do you remember about when was the civil suit that you mentioned related to the  
17          church, about when did you hear about that?

18          A    I was served paperwork for it. I have the paperwork at home and I can get  
19          back to you with the specific day if I go back. But I have it -- I have it at the house, but I  
20          don't remember what day I was served. And that's when I first initially found out that I  
21          was included in that civil suit.

22          Q    Okay. And then when you -- I know you mentioned that Mr. Hull said that  
23          he was willing to represent you pro bono for the purposes of the civil suit.

24          A    Yes, sir.

25          Q    But that that conversation was had in connection with testimony for Mr.



1 Biggs' trial, I think, right? Those were kind of discussed in tandem?

2 A Yes, sir. It was kind of a melded conversation. It was some about that.  
3 But he wasn't really interested in talking about that, he was more interested in talking  
4 about getting me on the stand for Joe Biggs' trial.

5 Q Okay. Was it your understanding or did Mr. Hull make it apparent that he  
6 would not represent you in the civil suit if you did not testify at Mr. Biggs' trial?

7 A No, sir. He never made that distinction between the two. There was  
8 never whatever the term is, quid pro quo, on that.

9 Q Quid pro quo. Yeah.

10 A Yeah. There was nothing for that.

11 Q And then I just wanted to ask. So I think you said that you sort of became  
12 suspicious of Mr. Hull's intentions or abilities when you heard about the deposition with  
13 Mr. Thaxton?

14 A Yes.

15 Q Can you just tell me what you were told about that or what you had heard?

16 A Well, he told me himself some that he basically -- he said, I may lose my law  
17 license over this or I might not be able to practice law for much longer after that. And  
18 he had said, basically, that you guys were going after Jay and it was -- and he cut it off  
19 early.

20 And then I talked to -- I did talk to Mr. Thaxton afterwards and said, how'd it go?  
21 And he's, like, yeah, it went okay, but Dan stopped it in the middle of questioning.

22 So I just kind of felt like between based on that and the conversations that I had  
23 had with him that maybe he wasn't stable enough for me to have me represent. I need  
24 somebody that's levelheaded instead of extreme one way or another, so --

25 Q Okay. And then I know Mr. Wellborn and I have discussed that you might

1 have some of those emails and texts. So I just want to remember. After this  
2 deposition, if we can get some copies of those or have you produce those that would be  
3 great.

4 A Yes, sir. Most of the stuff that we discussed about this deposition was  
5 done over the phone, but -- so I don't believe much of the conversations I had with him  
6 through texts were about this deposition. Most of that was on the phone.

7 Q Okay. Great. And then, just to be clear and wrap up that conversation, so  
8 with Mr. Hull you had not agreed to accept service or agreed to allow him to accept  
9 service.

10 A That is correct.

11 Q And you had also never discussed dates for the deposition or agreed to any  
12 dates.

13 A That is correct.

14 Q Okay. Great.

15 A Well, let me back up there for a second. We did discuss accepting service.  
16 I just never agreed to have him accept service.

17 Q Understood.

18 A He gave me, I think, 48 hours and let me know. And he never gave me the  
19 chance. He just accepted it.

20 Q Understood. Were you aware at that time that we were attempting to  
21 serve you?

22 A Yes. Yes, sir.

23 Q Okay. And how did you become aware of that?

24 A You contacted me, I believe.

25 Q Okay. But had you -- there were -- I'll let you know there were a couple of

1 attempts at service for you.

2 A Yes. I was not sure what they were for. When I got that civil service for  
3 the lawsuit from the church, when I finally got that, I thought that's what they were trying  
4 to serve at my mom's house.

5 So that's why I didn't make the connection to the two as to what it was. I  
6 thought that's what the service was. So once I got that, I was, like, oh, okay, maybe this  
7 is what it was about. So I assumed that that was what it was about.

8 [REDACTED] Understood. Okay.

9 Unless, [REDACTED] you have any questions on that topic, we can get on to kind of  
10 the substance of what we're here to talk about.

11 Are you good [REDACTED]? Okay. Great.

12 BY [REDACTED]

13 Q All right. Well, then let's just start with a little bit of background  
14 information about yourself.

15 Can you tell me where you grew up and give me a brief rundown of your  
16 educational background?

17 A I grew up in Rochester, New York. I finished about beginning of my 11th  
18 grade year in high school and I dropped out.

19 Q Okay. And then how did you get from -- you can high level briefly -- but  
20 how did you get from Rochester, New York, to where you are now?

21 A I just wanted out of there and decided that I found a better place driving  
22 from there to Florida and drove through Charlotte and decided that was it. That's  
23 where I wanted to be.

24 Q Okay. And about when did you move to Charlotte?

25 A That was in '08 or '09.

1 Q And what do you do professionally?

2 A I am a -- I own, like, a final mile delivery company. We own box trucks and I  
3 do delivery for companies, different companies that need products delivered to -- I do  
4 in-home deliveries.

5 Q Okay. Any income that you can think of right now from any other sources  
6 other than that kind of primary business activity?

7 A Right now, no. That's my -- that's it.

8 Q Any -- have you ever been paid by or received any income from your  
9 involvement with the Proud Boys?

10 A Directly, no.

11 Q Okay.

12 A They've never paid me for being a Proud Boy.

13 Q Okay. And what do you mean -- it sounds like maybe indirectly you were?

14 A No. I mean, if that's the question whether or not anybody's ever paid me  
15 to be a Proud Boy, no. I never have. Nobody's ever paid me.

16 Q Have you ever received any payments or any gifts of tangible things because  
17 you are a Proud Boy?

18 A Not that I -- not because I was a Proud Boy, no.

19 Q Okay.

20 A Not that I can think of off the top of my head, no.

21 Q I guess I'll just get to when you said directly made me think you were  
22 thinking of something else that you received an indirect payment.

23 When you made that distinction, what was the indirect payment that you were  
24 thinking of?

25 A An indirect payment? No, I don't think I've -- I don't think I meant indirectly

1 as I got payment from somebody else for somebody else. Nobody's ever come to me  
2 and said, here's money for being a Proud Boy.

3 [REDACTED] Mr. Bertino, have you ever been reimbursed for buying Proud  
4 Boys attire or buying any equipment?

5 The Witness. Have I ever been reimbursed for it?

6 [REDACTED] Yeah.

7 The Witness. Not that I can recall, no.

8 [REDACTED] Okay.

9 BY [REDACTED]

10 Q And we'll get into this a little bit more later, but just kind of on the same  
11 topic, have you ever participated in any fundraisers or received any money, like, on behalf  
12 of the Proud Boys or raised money for the Proud Boys?

13 A I've shared fundraisers through, like, on social media. I may have seen a  
14 fundraiser and shared it. So, yeah, I guess you could say that, yeah, I have done that as  
15 far as sharing it on social media, yes.

16 Q Okay.

17 A Are you asking if I've ever started a fundraiser myself? I'm just trying to  
18 figure out --

19 Q Yeah. I just mean, like, have you ever dealt with any donors for the Proud  
20 Boys? Do you have any contacts that donate money to the Proud Boys that you're  
21 involved with? Are you aware of donors to the Proud Boys?

22 A No, sir. No, sir. Not -- the only things that I've ever heard of was people  
23 donating -- giving money directly to Enrique Tarrio.

24 Q Okay. And who have you heard about giving money directly to Enrique  
25 Tarrio?

1           A    And this is all hearsay.   So, I mean, I've never physically been there when  
2   somebody handed him money.

3           Q    Sure.

4           A    You know, I just -- I've heard him talk about it.   There's was a point in  
5   Miami somebody donated \$7,000, and there was a big to-do about it, where it was  
6   supposed to go and what it was supposed to go to.

7           Q    And do you know who that was that donated \$7,000?

8           A    I don't.   Off the top of my head, no, I don't remember who it was.   It was a  
9   group somewhere in Florida.   A Republican group maybe somewhere in Florida.

10          Q    Okay.   And why was there a big to-do about where that was going?

11          A    Because there was chapters that said, where'd that money go, or it was  
12   supposed to go, did it go, it wasn't supposed to be a direct donation to your pocket.   So  
13   it became an internal issue.

14          Q    Okay.   Understood.

15               And then I'll ask you just about a couple specific individuals and we'll address  
16   these later.

17               But how about any money from Roger Stone to Proud Boys that you know of?

18          A    No, sir.   I don't know anything.   I've never met Roger Stone, so I don't  
19   know.   I have no knowledge of that, no.

20          Q    Okay.   And then how about do you know Alex Jones?

21          A    Yes, I do know Alex Jones.

22          Q    Okay.   Any donations to the Proud Boys or contributions to the Proud Boys  
23   from Mr. Jones?

24          A    Not that I'm aware of, no, sir.

25          Q    All right.   And then where do you currently live?

1 A I just -- I'm in the [REDACTED] area.

2 Q Okay. And do you have like a physical address right now?

3 A Two of them, actually.

4 Q Okay. Can you tell me what those are?

5 A Well, I just now moved in -- basically, I'm in the midst of moving in with my  
6 girlfriend [REDACTED], and that's the [REDACTED]

7 Q Okay.

8 A And I have a lease at [REDACTED], and that is in [REDACTED] which is in the same  
9 area.

10 Q Okay. And then let's just talk about any government service that you've  
11 ever been involved in.

12 Have you ever worked for a Federal, State, or local government?

13 A Is the military included?

14 Q Military would be included, yeah.

15 A Yes, sir.

16 Q Okay. And can you tell me about your military background?

17 A I joined the Army when I was 17. Didn't last very long. Got kicked out.

18 And then I joined the Navy again when I was 19 or 20, I think. And I was in the Navy for  
19 about 2 and a half, 3 years, I believe. I'm not sure what -- how long it was. It was  
20 20-some years ago.

21 Q Gotcha. Just approximations.

22 A I don't want to be dishonest and tell you it was 3 years if it was 2 years. I  
23 don't remember. To the best of my knowledge, I don't recall exactly how long.

24 Q Yeah. An approximation is fine. And throughout the deposition today, if  
25 there's anything you're ballparking, just feel free to let me know. We're certainly not

1 here to catch you up on details from 20 years ago that you may or may not remember  
2 clearly.

3 A Yes, sir.

4 Q Okay. And then you said you were kicked out of the Army. Can you just  
5 tell me quickly what --

6 A I was just -- I got an OTH discharge, other than honorable.

7 Q Okay. And what led to that?

8 A I broke my ankle when I was in basic training and they wanted to recycle me  
9 and start my training over again. And I would've had to sit there for 8 or 10 weeks for  
10 my ankle to heal.

11 So I left base, came back. I guess I went AWOL. Came back. And then they  
12 basically said, you can take an OTH and then you don't have to sit here.

13 And, again, I'm trying to remember exactly how it went 20 years ago. So I'm  
14 ballparking exactly the words that were said.

15 But it was, you can take this OTH and you don't have to sit here in medical and  
16 wait for your ankle to heal to get back into training. So that's what I did.

17 Q Understood. And then the Navy service, did that end with an honorable  
18 discharge or --

19 A OTH as well.

20 Q Okay. And what led to that?

21 A Being 21 years old and not wanting to conform to people that I didn't agree  
22 with the way they were handling stuff.

23 Q Okay. All right. Let's talk about the beginning of your involvement with  
24 the Proud Boys, and you can just start kind of at a high level.

25 But how did you first get introduced to the Proud Boys and become involved with



1 the organization?

2 A I believe -- I think I first heard of them actually on InfoWars. I saw a clip on  
3 Facebook with InfoWars of the Proud Boys. And so I started doing some research into  
4 what they were and who they were.

5 Q And about when was that?

6 A Maybe 2018 or '19. I don't remember exactly what year it was. They all  
7 kind of run together at that time. But probably 2018, 2019 maybe.

8 Q Okay. And what drew you to the Proud Boys or what did you see on  
9 InfoWars that attracted you to the group?

10 A Well, I saw clips of left-wing protesters attacking people and there was a  
11 group of guys who were willing to stand in the middle and not let them be attacked and  
12 protect them, and I guess that was just my -- I really -- I could identify with that.

13 I was tired of seeing people getting beat up on the street for, you know -- old  
14 people or whatever getting assaulted for just wearing a hat. Even if the hat didn't say  
15 what they thought it did, just wearing a red hat people were getting assaulted and it was  
16 frustrating. So I felt like it was my duty to protect people.

17 Q And in your view at that time, and let me know if it changed over time, was  
18 that sort of the primary focus of the Proud Boys doing that work?

19 A I thought that's what it was, yes, sir.

20 Q And what -- it sounds like you came to understand that there was a different  
21 focus. Is that the case?

22 A The focus of the Proud Boys, I guess, was twofold. It was originally  
23 supposed to just be a fraternity of men that got together, had beers, and that's the way it  
24 was originally supposed to be. And when I found that, I loved it because it was a way to  
25 get guys together and just do guy stuff and, like, a bowling league or something like that.

1           Then it became a little bit more politically charged, as the 4 years through Trump's  
2 term went on, it became a little bit more politically charged. I just liked seeing a fellow  
3 group of men who would protect people, but also still have that brotherhood and that  
4 fraternity that I guess I was missing at that time.

5           Q     You noted that the Proud Boys' interest in politics and political activities  
6 increased over the Trump Presidency. Was there something in particular that sparked  
7 that or can you describe that progression for me?

8           A     I think mostly -- it was always there. We always had political discussions  
9 and we always talked about the things that we agreed with or we didn't agree with or  
10 were free -- we believed in free speech.

11           So even if there was somebody in the group that said something separate from  
12 what most other people thought, it was allowed, you're allowed to say it. Nobody was  
13 going to chastise you for saying it. Well, even if they chastised you, it was going to be  
14 based out of fun.

15           But that's really what was the group was supposed to be about, was just having  
16 fun.

17           So I guess it's twofold. That and then the group that was willing to go out and  
18 protect people and not let them get beat up for their beliefs, whether it's on the left or  
19 the right, or conservative, liberal, it didn't matter. We didn't want anybody getting  
20 assaulted.

21           So that was pretty much -- that was pretty much where I stood personally. I'd  
22 held back many people on the right from assaulting people on the left as well. So I've  
23 always done my best to be a peacekeeper as much as I could in person. Let everyone  
24 say what they wanted to say and as long as you didn't get physical, it was fine.

25           ██████████ Okay. I think ██████████ might have some questions for you.

1 [REDACTED] Sure. Yeah.

2

BY [REDACTED]

3 Q Hi, again, Mr. Bertino.

4 You mentioned that you got interested in the Proud Boys because you saw videos  
5 of left-wing protesters attacking people. Is that right?

6 A That was my first introduction to them, yes.

7 Q Got it. Do you have a sense of who those people were, who the left-wing  
8 protesters were?

9 A Mostly -- I mean, there were -- they were just left-wing protesters at the  
10 time, antifa or black bloc or any of the -- a lot of the communist organizations that were  
11 obviously against free speech organizing.

12 Q Got it. Do you have a sense of kind of what they were trying to accomplish  
13 or what they were trying to prevent?

14 A Silencing anybody that they didn't agree with.

15 Q Got it. And you saw them attacking conservatives or right-wing people?

16 A The clips that I was fed, yes.

17 Q Got it.

18 A At the time that's when -- I mean, it's still based like that, but depending  
19 what algorithms you get, what you click on is what you're fed. So when you're only fed  
20 this and you're not fed this that's all you know.

21 Q Right. And where did you see the videos again?

22 A Probably on Facebook. Back then, to be honest with you, it's probably  
23 where it was, on Facebook. That's mostly back then what everyone used.

24 Q Got it.

25 All right. That's helpful. I'll turn it back to [REDACTED]

1

BY [REDACTED]

2

Q Do I understand correctly that there are multiple chapters of the Proud Boys in North Carolina?

3

4

A Yes, sir.

5

Q Okay. And are you a member of a specific chapter?

6

A No, sir.

7

Q Okay. Were you previously?

8

A Previously I had been, yes, sir.

9

Q Okay. Maybe that'll kind of help us level set for today so I can understand what your relationship with the Proud Boys is today.

11

So it sounds like you're no longer a member of the Proud Boys?

12

A That's correct.

13

Q Was there, like, an official disaffiliation process or how did that go?

14

A I think it was over time I started to disassociate and after -- after January of 2021, I think I'd only been to one meeting since then. If I can remember correctly, I'd only been to one meeting.

17

And I slowly just -- I still talked to some people online. I wasn't a member of a chapter. And then I got asked to be in a chapter just so that it would start, so they had enough people to start.

20

I never went to a meeting. I never did anything like that. I just kind of stayed away and kept my distance and just wanted to be -- just wanted to raise my kids, build a family, that sort of thing. And so I kind of steered clear.

23

And then I guess there's never really been an official -- I mean, I made it official myself and I told a couple of other people that I was done and I wasn't involved anymore. But I would say probably within the last 2 months I made it official.

25

1 Q Okay.

2 A I don't remember a specific date, though.

3 Q When was the time period that you were asked to join the chapter as sort of  
4 an organizing member or to recruit other members?

5 A It wasn't to recruit other members, it was just so that they had enough guys  
6 to be able to form an official chapter.

7 Q Okay. Because there's a --

8 A To be clear, I wasn't asked to join so I could go out and recruit people,  
9 because I wasn't actively recruiting anybody.

10 Q Okay. I thought you meant you were asked to join because you would  
11 attract members to the --

12 A No, sir.

13 Q You were just another body or another Proud Boy?

14 A Yeah. Just another name online, really, to make it an official amount so  
15 that you could start a chapter. That was it.

16 Q Okay. You said that around January 2021 is when you began distancing  
17 yourself, but that it was -- well, let's start there.

18 What caused you to begin distancing yourself from the Proud Boys?

19 A Well, after I was stabbed, I just met -- right before I went up December 12th  
20 and was stabbed, I had just met my now girlfriend, and when I came home, she took care  
21 of me. She got me back to health. And I made her a promise, I said, I'm not going back  
22 out there, I'm not going to go put myself at risk where I can die or do anything dangerous.  
23 I'm going to stay quiet. All I want to do is build a family with you, have a future with  
24 you.

25 And so I disassociated a lot from there. I mean, I still had my opinions, but I

1 disassociated from officially organizing or going out or doing anything with anybody.

2 Q Okay. We'll get into a little bit more detail about this in a moment, but I  
3 guess I just want to understand for as we enter kind of the rest of the discussion.

4 Obviously you were stabbed on December 12th, right?

5 A Yes, sir.

6 Q But then involved in -- and we'll talk about these more in the future -- but  
7 the MOSD and the MOSD chat groups, right?

8 A Yes, sir.

9 Q And the leadership of that organization?

10 So I just want to understand. Obviously, there was something else, right, that  
11 happened after the stabbing, because you were stabbed and then still quite involved with  
12 the Proud Boys. What --

13 A Well, I mean, obviously after January 6th, I definitely saw that -- and once I  
14 learned a little bit more information as more information came out, I started realizing  
15 that maybe I wasn't told everything or things weren't the way they were being told to me,  
16 where I decided to start disassociating. I still talk to some friends and whatever. But  
17 yeah.

18 But it was mainly -- I mean, it was mainly a combination of everything. It was like  
19 all at once everything got thrown. I'm recovering from stab wounds and then  
20 January 6th happens and guys are getting arrested. It was like that's not what  
21 I'm -- that's not what I joined this for and it's not what I'm here for.

22 Q You mentioned a few things that you think weren't explained to you or  
23 disclosed to you that you discovered that kind of changed your mind about being a  
24 member of the Proud Boys. What are the things that stand out in your mind that you  
25 learned around January 6th or after January 6th that have led you to distance yourself

1 from the Proud Boys?

2 A Well, I guess --

3 Mr. Wellborn. Yeah. Let's take a second. We're just going to mute.

4 [REDACTED] Okay. Sure.

5 [Discussion off the record.]

6 Mr. Wellborn. We're good. There was just a matter that came up during the  
7 debrief. So we're good.

8 The Witness. One of the main things that I just recently found out was about a  
9 document that was in possession of Enrique. And I was highly stunned, very  
10 disappointed and very -- felt dragged into some stuff that I had no idea about until I saw  
11 that in a recent debrief.

12 BY [REDACTED]

13 Q Okay. And are you talking about the "1776 Returns" document?

14 A Yes, sir. Yes, sir.

15 Q We can talk about that a little bit more in context later. I guess I'll first ask,  
16 you don't have a copy of the "1776 Returns" document?

17 A No, sir. I never saw it until I was shown by an FBI agent what it was. So I  
18 had never seen it, never heard of it, had no idea.

19 Q Okay. And then a question that I forgot to ask earlier.

20 From your interview with the DOJ and FBI, did you receive a copy of the FBI's  
21 assessment? It's sometimes called FBI 302. Mr. Wellborn, might be able to help you  
22 out with this. Did you receive a 302?

23 Mr. Wellborn. No, he did not receive a 302.

24 [REDACTED] Okay.

25 Mr. Wellborn. And just so we're clear, we're talking about a 302 post-debrief or

1 a 302 pre-debrief, regarding a 302 that would relate to an interview with someone else?

2 [REDACTED] I just meant is there a 302 about Mr. Bertino's interactions with the  
3 FBI that you have.

4 Mr. Wellborn. We do not have a 302. That's a direct answer to your question.  
5 The entire interview was recorded, unlike the traditional way where they just take notes  
6 and issue a 302. At my insistence and I think also their insistence, the entire interview  
7 was recorded.

8 [REDACTED] Okay. Have you -- have you or are you going to receive a copy of  
9 that?

10 Mr. Wellborn. I have not. Whether I'm going to receive a copy of that  
11 transcript is -- I guess I'll find out. But I have not received a copy of it.

12 [REDACTED] Okay.

13

BY [REDACTED]

14 Q All right. So let's just kind of go back to your time when you were a  
15 member of the Proud Boys.

16 Was there a particular chapter that you were a member of?

17 A For a long time I was a member of the Charlotte chapter.

18 Q And then you've mentioned Mr. Thaxton. Was he a member of the same  
19 chapter or a different chapter?

20 A Yes, sir, he was.

21 Q The same chapter?

22 A Yes, sir.

23 Q Okay. And then how about Mr. Charles Donohoe? I believe he's also  
24 from North Carolina. Was he a member of that chapter?

25 A No, sir.



1 Q Which chapter was he a member of?

2 A It changed -- it changed a lot, the name. I think it was Piedmont and then  
3 Northwest or something. I couldn't even keep up, to be honest with you, but for a long  
4 time I believe it was Piedmont.

5 Q Okay. And do you mean he switched between chapters or the name of the  
6 same chapter just kept changing?

7 A I guess you'd have to understand a little bit more about internal drama to  
8 know that chapters were always splitting and this guy hates this guy. So, again, it was  
9 hard to keep up. So officially I don't know what chapter he was in as of recent.

10 Q Okay. And then have you ever held any positions or titles in your chapter?

11 A In Charlotte, no. For a brief moment, I was a vice president of the  
12 Columbia -- I believe it was the Columbia chapter. And that lasted about maybe 3 weeks  
13 to a month, if I can remember my dates correctly. I'm, again, trying to remember. But  
14 it wasn't very long I was there as a vice president.

15 Q Okay. Can you just describe your relationship with Mr. Thaxton for me?

16 A I met Mr. Thaxton before he was a Proud Boy at a flag wave, and I became  
17 pretty good friends with him over the years. So I've known him probably 4 years,  
18 something like that.

19 Q Okay. And then I'll just note for the record that [REDACTED] has  
20 joined the Webex also. He's another investigative counsel with the committee like [REDACTED]  
21 [REDACTED] and I.

22 Okay. So you said you met him about 4 years ago, you think?

23 A I'm guessing. I'm ballparking there, but yes.

24 Q Sure. And you just met him through the Proud Boys?

25 A No, sir. I met him before he was a Proud Boy at a flag wave.

1 Q Okay.

2 A Yeah. So then he joined the Proud Boys after that.

3 Q Got it. And would you say he joined through you or you were one of the  
4 people that brought him into the Proud Boys?

5 A Yes, sir. I was in at that time.

6 Q Okay. And then how about Mr. Donohoe? When did you first meet Mr.  
7 Donohoe?

8 A First met him -- I can't recall when I first met him, to be honest with you.

9 Q Was it through the Proud Boys or --

10 A Yes, sir. Yes, sir.

11 Q Was it in 2020 or some time significantly earlier than that?

12 A It was earlier than that, but I don't remember dates, years when I actually  
13 met him.

14 Q Got you. Are we -- not to belabor the point -- are we talking like 2 or  
15 3 years ago, are we talking like 10 years ago?

16 A No, no, not 10 years ago. The Proud Boys haven't been around 10 years.  
17 But, yeah, probably -- it was probably 2, 3 years ago. I'd probably been in the club for  
18 maybe a couple years before I met him.

19 Again, I'm ballparking. I don't remember specific dates from last month let alone  
20 4 years ago. I'm doing my best, though.

21 Q Okay. I appreciate it.

22 And then am I right that you're fourth degree in the Proud Boys?

23 A Was.

24 Q Was a fourth degree? Okay.

25 And to become a fourth degree, what do you have to do? Is there a way that

1       you earn that degree?

2               A     Yes.   You make a sacrifice for the club, either you're assaulted, you lose  
3       your job, you were to get doxxed, get stabbed, stop somebody else from getting stabbed,  
4       that sort of thing.

5               So it wasn't just purely getting into a fight or beating someone up like a lot of  
6       people made it out to be.   It wasn't like that.   But that was definitely part of it or it  
7       could be.

8               Q     And what did you do specifically or when did you earn your fourth degree?

9               A     That would be election night in D.C.   There was a man being attacked by  
10       three teens who had just left what they call Black Live Matter Plaza, I believe.   There was  
11       an old man walking back from a party, I'm assuming on his own, and there was a group of  
12       us up there.   And we were just walking around after the election.

13              And three people went to go assault an older man and we stepped in and stopped  
14       them from assaulting him.   And I believe two or three people were stabbed that night,  
15       one of the guys that we were stopping pulled out a knife and stabbed a woman in the  
16       back, stabbed another man in the face.

17              I think somebody else was stabbed, too, but I can't remember the details clearly  
18       from it.   But yeah.   That was -- so I guess it would be November 2nd or November 3rd.

19              Q     November 3rd.   Okay.   We'll return to November 3rd in a little bit and talk  
20       about a few more details there.

21              And then can you tell me, do you know what -- same questions for Mr. Thaxton.  
22       Do you know what level he is and how he earned that level?

23              A     Specifically, I think he was a third degree, because I think he got a tattoo, if I  
24       remember correctly.   That's all I know.   I don't know that he ever was given a fourth  
25       degree.   I don't know.

1 Q And then how about Mr. Donohoe?

2 A I believe he was a fourth degree.

3 Q Okay. And you don't know how he earned his fourth degree?

4 A I do not.

5 Q Okay. All right. And then we haven't talked about Mr. Tarrio, and  
6 obviously we will a little bit more later today. But if you can just describe your  
7 relationship with him and tell me how you first met him?

8 A First met him in person? I first met him January of 2020 in Virginia, I  
9 believe was the first time I met him. No, I'm sorry. I'm sorry. Let me rephrase that.  
10 I believe I met him at September of 2019 in Las Vegas at the yearly convention.  
11 That was the first time, I believe, I met him in person, yes, sir.

12 Q Okay. And let's say during the time frame 20 -- or just describe to me how  
13 your relationship looked in 2020. Were you in frequent contact? Would you describe  
14 yourselves as friends?

15 A At the beginning it wasn't frequent. Then January of 2020 we started  
16 talking more. I was organizing some flag waves and stuff and was asking for some  
17 advice on how to do it, because he seemed pretty good at getting flag waves and small  
18 stuff together.

19 So that's when we started talking, January 2020. And he came to Virginia for the  
20 Second Amendment rally.

21 Q Can you just describe what a flag wave is for me?

22 A Flag wave would be where a group of people get together on the side of the  
23 road and wave American flags or Trump flags or Hillary flags or whatever type of flags  
24 that they felt like waving. They do it on overpasses, on the street, stuff like that.

25 Q And so it sounds like over the course of 2020 through talking with Mr. Tarrio

1 about organizing these sorts of events you became closer or you started talking more  
2 frequently?

3 A I believe -- yeah. I mean, I believe I kind of -- I liked him. I think I loved  
4 him more than he loved me. But yes, yes, I would say that. Yeah.

5 Q What did you like about Mr. Tarrio?

6 A I can't pinpoint. Just he was a funny dude, laughed a lot, was willing to say  
7 anything. He didn't care. Just seemed like a good dude.

8 Q And at that time he was the chairman of the Proud Boys, right?

9 A Yes, sir.

10 Q And when was the last time you spoke with Mr. Tarrio?

11 A I can't recall. I don't recall, so I'm not going to try to answer because I don't  
12 remember a specific date.

13 Q Do you think it was sometime this year?

14 A Yes, sir.

15 Q 2020?

16 A Yes, sir.

17 Q How about -- maybe we can place it with reference to either when he was  
18 released from prison before his subsequent arrest --

19 A I would say, yes. I did speak with him in between that time.

20 Q [Inaudible] that time.

21 A Yeah.

22 Q Okay. And what did you speak about when you spoke to him?

23 A I believe -- I believe the last time that I spoke to him, that I can recall, was  
24 when he gave me Dan's number.

25 Q And then how about for Mr. Thaxton nowadays, are you in frequent contact

1 with him?

2 A No, sir. I haven't spoke with him.

3 Q Okay. Was the last time you spoke to him when you talked about the  
4 deposition with Mr. Hull?

5 A I believe I spoke with him the -- briefly the night that my -- or the day or the  
6 night that Nicole's (ph) house was raided by the FBI.

7 Q And what did you speak about that day?

8 A Just about what was happening and that was it. Like I said, it was pretty  
9 brief. It was just a quick discussion, like, I didn't have a lot of time that day to go into  
10 much.

11 [REDACTED] Okay. I think, [REDACTED], did you want to ask a couple  
12 questions?

13 [REDACTED] Yeah, just a couple of follow-up questions.

14

BY [REDACTED]

15 Q What was your understanding of Mr. Tarrio's role that he had as chairman?

16 A Tiebreaker for the Elders Committee was what it was originally supposed to  
17 be and he was kind of a spokesperson.

18 Q Got it. Do you feel like he had kind of broad buy-in from Proud Boys across  
19 the country?

20 A I'd say it was probably split 50/50 if I had to guess, but that's just a guess.

21 Q Yeah. Do you know where the other 50 percent, where there loyalties  
22 were?

23 A The other 50 percent, I can't make a distinction on what everyone in the club  
24 wanted. I mean, there was an overwhelming no structure, no leadership, everybody do  
25 what they want to do was the majority of what the other people were looking for.

1 Q Got it. And you mentioned that -- I'm sorry.

2 [REDACTED] Just to quickly follow up on that.

3 When you say split 50/50, do you mean the 50 percent that opposed him in some  
4 manner, did they recognize that he was chairman and just weren't happy about it or was  
5 there somebody else that they thought was leading the Proud Boys?

6 The Witness. No. I think they recognized him as the chairman. They just  
7 didn't like him.

8 [REDACTED] Okay. Understood.

9 BY [REDACTED]

10 Q Got it. You mentioned that he would be the tiebreaker on the Elders  
11 Committee. Do you remember who else was on the Elders Committee when you were  
12 there?

13 A It changed every year. Every year they did elections and they changed  
14 every year. So I cannot precisely recall every one because, frankly, I don't know  
15 everyone's real names. Their handles changed on Telegram all the time. It was very  
16 difficult to keep up with.

17 Q Got it. So in 2020, do you remember who was on the Elders Committee?

18 A Specifically, I do not remember everyone, no. I remember Pat and I'm  
19 trying to go back and remember, like, usernames. Mob 7 (ph) are the only two that I  
20 can remember off the top of my head.

21 Q Do you happen to know Pat's last name?

22 A I do not.

23 Q Got it. Were you ever on the Elders chapter?

24 A No, sir.

25 Q Got it. Do you have a sense of why people didn't like Enrique Tarrio?

1           A    I can't speculate on why everybody didn't like him.  Everyone has their own  
2   reasonings for not liking someone, I guess.  I think the majority of -- I don't know, this is  
3   speculative, but I'd say most people just didn't want anybody in charge.  Didn't want  
4   anybody in charge.

5           Q    So I understand that you don't want to speculate.  Did you hear anyone  
6   talking about why they didn't like Enrique Tarrio?

7           A    Yeah.  A lot of people just thought he was out for himself.  Those are  
8   some of the things I've heard.  Again, that's hearsay, and, I mean, there's a million  
9   different reasons people don't like someone these days.

10          But yeah, that's probably the majority of most of why, they just didn't want  
11   anybody to be in charge of them, I guess.  I don't know.

12          Q    Got it.  That's helpful.

13          So you mentioned when we were asking about how you left the Proud Boys, you  
14   mentioned that you saw the "1776 Returns" document and that kind of shocked you and  
15   led you to disaffiliate.  Is that fair to say?

16          A    Hold on a second.

17          Yeah.  I had already left and I didn't see the "1776 Returns" until probably  
18   3 weeks after, maybe even a month after I had officially quit.  I can't remember dates.  
19   But yeah.  I didn't see it while I was still a Proud Boy.

20          And there's no really official way to quit other than you just say to yourself or a  
21   couple people that you know that, hey, I'm done.  I'm out of here.  I'm not part of it  
22   anymore.

23          You don't have to, like, make a public declaration or anything like that.  So you  
24   decide your level of involvement and I decided I wasn't going to be involved anymore.

25          Q    Sure.  Understood.  I guess I'm trying to get a sense of the timing, because



1 I think -- my understanding is that you talked to The New York Times in December, this  
2 past December, about the Proud Boys. So did you leave the organization after that?

3 A Yes, sir. It was after that, yes.

4 Q Got it. And, again, do you have a sense of why you left? Because I think  
5 we've only talked about "1776 Returns."

6 A I guess a lot of it was the internal drama. A lot of it was I just didn't want to  
7 be involved anymore. I had some personal choices that I decided to make because I  
8 wanted to just pursue and be focused on my family, my relationship, all that stuff, and  
9 that was an outside distraction that I didn't need and didn't want to be a part of anymore.

10 And, frankly, after January 6th, I had a bad taste in my mouth throughout that  
11 past year of learning new things that I had realized after things came out in the news and  
12 stuff like that that I didn't even know about. I just -- it pushed me away from the  
13 organization.

14 [REDACTED] Got it. That's helpful. I think we can return to this later, but I'll  
15 turn it back to [REDACTED]

16 BY [REDACTED]:

17 Q I want to ask a couple more questions about finances and the Proud Boys. I  
18 know we talked a little bit about fundraising and you mentioned that you haven't  
19 organized any fundraisers, but that you would share other people's fundraisers on social  
20 media. Is that right?

21 A For other people, yes, that's correct.

22 Q And do you recall any specific instances of that happening, of somebody  
23 starting a fundraiser for the Proud Boys or related to the Proud Boys?

24 A Oh, numerous times.

25 Q Okay. How about in relation to January 6th?

1           A    There were -- yeah, there was some -- there was definitely some fundraisers  
2   where guys were trying to get money together so that they could go to both  
3   December 12th and January 6th.

4           Q    Okay.  Do you remember just any specifics about those?  We can go down  
5   the list if you've got a few different recollections.  But who specifically do you remember  
6   doing fundraisers?

7           A    Joe Biggs had one.  Rufio had one.  I think some guys from Philadelphia  
8   had one.  I mean, there was -- they started to pop up all over the place.  So, I mean,  
9   there was a lot of them.  I don't know whose was real, whose wasn't, that sort of thing,  
10   so -- because there's a lot of people that will get out there and try to raise money under  
11   false pretenses using an organization or a name or something like that to make money.

12           So I don't know which ones were real, which ones weren't, to be honest with you.  
13   And, frankly, I didn't know every Proud Boy across the country, so I couldn't tell if they  
14   were legitimate guys or not.

15           Q    You had mentioned one specific donation of \$7,000 to, I think, Mr. Tarrio.  
16   Do you remember any other particular large donations?

17           A    Other than the fundraiser that he -- there was, like, a hundred thousand  
18   dollar fundraiser, I believe, when he was arrested January 4th.

19           Q    And it was started by Mr. Tarrio?

20           A    Yeah.  And I believe he had a donation link on his website, 1776, I believe  
21   he had a donation link on there.  And there's no telling how much money went through  
22   there, I have no idea, or where it came from.

23           Q    Okay.  And then I think we've covered this, but just to make sure.

24           Do you remember any particular donors to the Proud Boys?

25           A    Just random people.  I mean, yeah.  I mean, anybody -- are you looking for

- 1 anybody specific to see if I know him?

1

2 [11:20 a.m.]

3 BY [REDACTED]:

4 Q If you recall any specific individuals that donated to the Proud Boys?

5 A That donated Proud Boys directly or donated to one of the some -- to some  
6 of the fundraisers? I mean I --

7 Q Like one of these fundraiser that was related to the Proud Boys run by a  
8 Proud Boy?

9 A Oh, no. I mean, specifically, no, I don't remember.

10 Q Okay.

11 A I don't. I don't remember, specifically, anybody. There were hundreds of  
12 people that donated. Thousands even, probably.

13 Q Okay. And then just one -- I'll ask about one particular potential donor.  
14 Do you know a man named Patrick Byrne, B-y-r-n-e?

15 A No, sir.

16 Q Okay. Is the founder involved with overstock.com. Does that ring any  
17 bells?

18 A I've heard of the website.

19 Q But not in relation to the Proud Boys?

20 A No, sir, that's news to me.

21 Q Okay. Let's move to the election in 2020, I want to focus for a second, the  
22 debate in September of 2020 where President Trump said the phrase that we all know,  
23 "stand back and standby."

24 A Uh-huh.

25 Q Can you just tell me, you know, when you heard that, what did that mean to

1       you, or kind of explain your experience of hearing that to me.

2               A     So do you want me to go back in my mind frame at that time?

3               Q     Yes, exactly.

4               A     Okay. At that time, it was just I was in awe that the group that I was a part  
5       of was mentioned like -- like we didn't think we were anywhere near that known or that  
6       specific, or that that would be brought up at a Presidential election. I mean, obviously,  
7       we reveled in it for a little bit. You know, like, holy crap, the President just mentioned  
8       us. So there was a little bit of a, I guess, mistakenly boastful pride in it. But I don't  
9       think that so many guys, you know, back then read into it what other people read into it.  
10      So I think there was kind of like a -- I think we looked at it more as, holy shit, this guy just  
11      mentioned us. And other people looked at is -- other people who may not have agreed  
12      with us looked at as, oh, he just gave us marching orders.

13              Proud Boys aren't inherently smart. So we're not the most inherently intelligent  
14      individuals. So we don't really pick up on cues like that. I just thought it was, hey, holy  
15      crap, the President just mentioned us. I wasn't paying attention to what the words said.  
16      I still to this day don't know what he was trying to say. I think he was just blabbering at  
17      that point.

18              Q     You mentioned that you think Proud Boys were, I think the words you used,  
19      were mistakenly boastful about that. Why do you think that was a mistake?

20              A     Well, I think that -- I think that that unfortunately led to an infection in the  
21      group of people who, you know, thought it was the militia, and that's where it changed.  
22      I think that's where it changed.

23              Q     Can you expand on that a little bit? Why, why did that idea get, you know,  
24      get kind of seeded by that phrase?

25              A     I think it was mostly people -- you know people from the outside looked at it,

1 and they didn't know who we were at that point. So they just looked into it and like:

2 Oh, crap, I'm going to go buy it -- I am going to go get in.

3 And then there were thousands and thousands of thousands of emails every day  
4 about wanting to join and wanting to join. And too many people just took every nutcase  
5 they could and said: Yeah, come on in, come on in.

6 And I think that's what led to the downfall of it. It's not what it was supposed to  
7 be.

8 Q And so would you say that Proud Boys' numbers increased after the "stand  
9 back, standby" comment?

10 A Exponentially. I'd say tripled probably. With the potential for a lot more,  
11 eventually most people shut down their vetting process and said no more. But because  
12 it leads to people who didn't understand what it was supposed to be out there  
13 representing the club and doing stupid things, which eventually led to my stabbing and  
14 led to other stuff, so yeah.

15 Q And for the new folks that joined after that comment was made, did you  
16 have any assessment about kind of what their intentions, or if they were different than  
17 Proud Boys that had joined previously? How would you compare the group that joined  
18 after "stand back, standby" to those that existed before?

19 A Just new. Didn't understand the culture, didn't understand what it was  
20 supposed to be. Initially, just thought we were just some big fighting militia and just a  
21 bunch of street brawlers, and that's what we were supposed to go out and do all the  
22 time. So they were like -- one of the big rules of the Proud Boys was we never go to  
23 anybody else's events; like if antifa was holding a protest or whatever, we don't go there  
24 to their stuff. And I noticed, for example, you know, some guys talking about: Hey,  
25 we're going to go, you know, crash into this -- go crash this party, crash this antifa protest.

1           And everyone had to be like: No, that's not what we do. We don't do that  
2 stuff.

3           So I think the culture of the club, unfortunately, changed after that. That's just  
4 one example.

5           Q    I think [REDACTED] has some questions on this point, and then we can  
6 probably take a break for a few minutes after we close this up.

7           BY [REDACTED]:

8           Q    Yeah, Mr. Bertino, you mentioned that people had a perception that the  
9 Proud Boys were a militia or street brawlers. What, in your view, was incorrect about  
10 that perception?

11          A    Like I stated earlier, I believed that we were always standing up for free  
12 speech and the right for people to say what they wanted to say without fear of being  
13 assaulted, without fear of being attacked. So, when I looked at it as people, it's like,  
14 "Oh, man, they just go out, and they go do this and do that, and they look for trouble," it  
15 was never about looking for trouble when I did that. When I would go to  
16 somewhere -- or my intentions personally and anybody that was there with me, I always  
17 conveyed that we do not go out looking for fights. We don't -- you can say what's on  
18 your mind, you can say what you want do, but you never swing at somebody; you never  
19 assault someone. You always have to act in defense. If somebody comes after to you  
20 or someone else, then you can defend them. But, so I guess that's where it was  
21 supposed to be. And December 12th was a great example of guys running off, starting  
22 fights, not listening, going off just running all over the city of D.C. looking to start fights  
23 instead of just marching and saying their peace.

24          Q    I guess I'm not sure I understand, understand what you're saying because  
25 you mentioned that there was like this internal rule within the Proud Boys that you don't

1 go to other people's events.

2 A Uh-huh.

3 Q But isn't that what the Proud Boys did during the entire summer of 2020 by  
4 going to Black Lives Matter protests?

5 A Not that I -- not that I remember. It was not supposed to be -- you were  
6 not supposed to go to that stuff. You were -- you were never supposed to go there.

7 Q But Proud Boys did.

8 A And that's one example of people not listening and following what the rule  
9 has always been.

10 Q But you say -- I'm sorry, you said that people stopped following the rules  
11 after they -- after Trump said stand back and standby, but people were -- Proud Boys  
12 were fighting in the streets and going to other people's events well before that.

13 A I guess for me to be able to comment, you'd have to give me a specific, like,  
14 rally you're talking about instead of a general they went there and did this. I'd need like  
15 specific instances to be able to comment and say that.

16 Q So you're not aware of any instances in which the Proud Boys went to other  
17 events and fought people in summer 2020?

18 A They weren't supposed to, no. They weren't supposed to. They were  
19 supposed to only --

20 Q What do you mean they weren't supposed to?

21 A Yeah, I mean, if you can show me like something, I guess, like an example of  
22 where they went to somebody else's event, I mean, then, I would wholeheartedly agree  
23 that that's wrong and they weren't supposed to do that. I am just saying what the rules  
24 were supposed to be. And I did not -- like if I knew of anybody else going to somebody  
25 else's event, like if I knew there was an antifa event, like I said earlier, I would stop them



1 and say: Hey, no, you're not supposed to do that. That's not what we do.

2 Q Okay. So are you saying that you weren't aware of other Proud Boys  
3 groups in other parts of the country going out and attending Black Lives Matter events?

4 A Absolutely. I mean, if it was a designated Black Lives Matter event and  
5 they went, then I would totally disagree with it, and I would have -- I would have made  
6 that known that I disagree with that. Absolutely. 100 percent. Because that was not  
7 what we were ever supposed to do.

8 Q So you're saying that you either weren't aware or you did speak out; which  
9 one is it?

10 A What I'm saying is, if anybody ever mentioned that or there was ever any  
11 talk about it, then I would say, yes, we don't do that. But I am not specifically aware of  
12 somebody going to somebody else's event. Because what you have to understand is  
13 when I'm seeing videos of events that's happening in California or in Portland or in Ohio  
14 or anywhere else, I don't know what that event is supposed to be. I don't know if it was  
15 originally a Republican event or a Conservative event, and then the other people showed  
16 up. Because that's the way it was always showed to us, is: This was an event for  
17 somebody else -- you know, this was our event or right -- or somebody on the right side  
18 organized it, and the left-wing protesters showed up, and then the fights ensued. That's  
19 always the way it was depicted to me and showed to me, was: This was this event, and  
20 they came in to start fights.

21 I, specifically, 100 percent honestly do not remember ever someone say saying:  
22 Hey, we went to this Black Lives Matter event and beat somebody up.

23 I don't remember that. It was never supposed to be that.

24 Q Why do you think the Proud Boys came up during the Presidential debate in  
25 September 2020?

1           A     That I don't know. I have no idea. I believe that there was a big  
2 demonstration in Portland shortly before that, like a few weeks before the debate. And  
3 I was -- I was there in Portland, but it wasn't a Black Lives Matter event. It was an event  
4 organized by the Proud Boys that we all went to a park, and we hung out in the park all  
5 day, but it wasn't a Black Lives Matter event. So it wasn't --

6           Q     Were you at that event?

7           A     Yes, sir.

8           Q     Okay. Well, we can return to that later. I also wanted to ask, did you feel  
9 like Trump supported the Proud Boys?

10          A     Supported? I mean, I can't speculate. Do I feel like he did? I don't think  
11 he knew who we were very much -- you know, I think he had more stuff on his plate. I  
12 don't think -- I realize now, once it was brought up in the Presidential debate, that maybe  
13 we were a little bit bigger than I thought we were; that more people knew about us than I  
14 thought we were. But, I mean, on a daily basis, I would walk around and have a Proud  
15 Boys shirt on and nobody would know what it was.

16          Q     Okay. Well, I'm asking about Trump specifically, and we were just talking  
17 about the "stand back and standby" comment. So, after that, did you feel like Trump  
18 supported the Proud Boys?

19          A     No, I don't, actually. I think he immediately walked it back. I think, like 2,  
20 3 days later, if I remember correctly, I think he walked it back and then started saying  
21 something about with White supremacists, and stuff like that. So.

22          Q     Okay. So you mentioned, when we were asking about the reaction of the  
23 Proud Boys to Trump's comment, you mentioned that some people saw that as a call to  
24 action. So those are discussions that you heard. Is that right?

25          A     Can you give me one second? My attorney had to step away. I want him

1 to be able to hear this.

2 Q Sure.

3 [REDACTED] We can go ahead and take a couple minute break if you want to go  
4 off the record for a record. Is that okay -- actually, we can wait. We can finish this  
5 topic. Yeah, let's do that.

6 Mr. Wellborn. Sorry about that. Can you go ahead and ask that question  
7 again?

8 BY [REDACTED]

9 Q Sure. So I'm asking about the period right after Trump said "stand back and  
10 standby," and I think you mentioned earlier that some people within the Proud Boys saw  
11 that as a call to action. Can you expand on that, what you heard?

12 A I just -- I think it was just a -- are you talking about the people in the  
13 organization at the time or the new people that joined afterwards? I guess, I would  
14 have to know which.

15 Q Either one.

16 A I guess, the new people -- the people that were there already, we just  
17 thought it was cool that we got mentioned on the Presidential debate. And we were  
18 trolling as hard as we could on everyone else and really basking in it I guess. But, again,  
19 when you go -- you know, when you go back and look at it, it was actually the downfall of  
20 a lot of stuff. So the new people took it -- I guess, they would have taken as it, quote,  
21 marching orders, I don't know. But I can't -- I can't specify, and I can't speculate what  
22 the new people thought.

23 Q Okay. You mentioned that the Proud Boys were getting thousands of  
24 emails after that?

25 A That's what I was told, yes.

1 Q Okay. Do you remember who told you that?

2 A Everyone. You know, anybody that was in a chapter or in a national chat  
3 would mention, like: Man, I got 500 emails this week. You know, stuff like that. So I  
4 can't give you specifics of who and where and when, but, yeah, it was kind of known  
5 throughout the club that there was a big influx in membership requests.

6 Q Got it. I'm just trying to understand what your role in the organization was  
7 such that you would know that there were thousands of new members joining.

8 A I think just everybody understood that. Everybody that was in the club or  
9 in the organization knew that, that that was going to blow up. There was multiple  
10 waves of membership. The Rufio wave. The, you know, after -- I can't remember what  
11 the second event was. But there was always like a wave of, whenever there was a news  
12 cycle and we were on it, we would get like more of an interest in joining. And then,  
13 obviously, the "stand back, standby" was like the pinnacle of the news coverage where  
14 everybody wanted to join.

15 Q Uh-huh.

16 A And so it was just widely known throughout the group.

17 Q Got it. That is helpful.

18 [REDACTED], I think you wanted to take a break. I'll turn it back to you.

19 [REDACTED]. Yeah, I just have a couple followup questions on that point.

20 BY [REDACTED]:

21 Q So, obviously, in the September debate, President Trump mentioned the  
22 phrase "stand back, standby" when he was asked if he would denounce White  
23 supremacist groups. And then the Proud Boys organization was brought up as one of  
24 those groups, asking if he would denounce the group. Given that that's context Proud  
25 Boys were brought up in, were the members that joined afterwards, did they find that an

1 unattractive characterization of the Proud Boys? Did you get the sense that the  
2 members that joined after Trump were more prone to that ideology?

3 A I'll be honest with you, I didn't interact with a lot of the new people. I  
4 mean, I just -- I'd see them at -- but for me to be able to say one way or another  
5 whether -- you know, the -- I mean, I can tell you the culture in the group always stayed  
6 the same throughout that up until then, and then there was obviously big internal wars  
7 after that about, you know, how the group should be run or what the group's value  
8 should be.

9 But there were always those internal discussions and arguments. I did not feel  
10 like it influenced more White supremacist people to try and join. I think they were  
11 always trying to join because my belief and my view of it back then was if -- if I say that,  
12 you know, Kentucky Fried Chicken has the best chicken in the country, people are going  
13 to go there expecting chicken, right? But if they've got better biscuits than they do  
14 chicken, you know, and you go there and you order the biscuits, you might go: Okay. I  
15 like these biscuits better than I like the chicken.

16 So I think that they should be talking about that and not the -- you know, not just  
17 the chicken. So I think that people have a false sense of reality of what I saw the group  
18 as, especially news media, stuff like that. I had, you know -- I don't -- I never agreed  
19 with the White supremacist narrative because I wasn't one; my kids are mixed. You  
20 know, I've never held that type of view that I -- you know what I mean? On a serious  
21 note, never. My kids are mixed. I don't -- I didn't join for that, and I think a lot of  
22 people didn't join for that.

23 I think, actually, a lot of the newer recruits were probably more against anybody in  
24 the club that may have had some racist views. I think honestly. If you want my honest  
25 opinion, and that's just an opinion, I feel like more people joined that looked at the core

1 attendance of the group that they were supposed to be and wanted to adhere to that.

2 Q Okay. And then just to make sure I understand your analogy, the chicken  
3 and the biscuit analogy, the chicken is the White supremacy?

4 A Yes.

5 Q And the biscuit is the --

6 A The biscuit was the truth. The biscuits are the truth.

7 Q Fraternity or -- yeah, okay. But --

8 A Yeah. The truth about what I felt the group was. Let me just specify  
9 there.

10 Q Sure. And then can you compare Proud Boys' support for President Trump.  
11 So we asked kind of the opposite: What did President Trump think about the Proud  
12 Boys?

13 But now I want to know pre "stand back, standby," what did Proud Boys think of  
14 President Trump? And then, afterwards, how did that change?

15 A I'd say it was like probably 90 percent supported Trump. There was a lot of  
16 guys in there that didn't, honestly. There was definitely a lot of guys that did not. And  
17 that had been from the beginning. It wasn't just like a President Trump support group.  
18 There was a lot of guys that I joined that didn't like Trump. So, but, I mean, after, I'd say  
19 they, you know, they definitely showed support for him over anybody else, yeah.

20 Q Okay.

21 BY [REDACTED]

22 Q Why do you think 90 percent of the Proud Boys supported Trump? What  
23 do you think was attractive about Trump?

24 A To be honest with you, I don't know. I mean, looking back at it, I guess,  
25 because we were all about free speech, and he would say anything that came to his mind.

1 Looking back, it's probably not a great idea as a President to, you know, to spout off with  
2 anything you want. But I just think he kind of embodied maybe -- he said the right  
3 things. Let's just put it that way. He said the right things that most people wanted to  
4 hear.

5 Q Got it. Do you have a sense of who those right things are?

6 A Issues on gun control, issues on abortion, issues on the way, you know, fiscal  
7 stuff, and how to manage the country financially that, I guess, that's -- that was most  
8 attractive. That sort of stuff.

9 Q Okay. What about stuff he said about antifa?

10 A Oh, yeah. I mean, of course, yeah.

11 Q What about stuff he said about Black Lives Matter?

12 A Yeah, I guess, I guess so. I don't really remember too many of his  
13 comments about Black Lives Matter other than -- you know, like I said, I don't remember  
14 all of the comments that President Trump made over his 4 years or in his campaign, so I  
15 can't say specifically.

16 Q Did you hear people talking about his views on immigration?

17 A Yes.

18 Q People support -- Proud Boys supported his views on immigration?

19 A I would say, yes, sir, for the most part.

20 Q Got it. Okay. [REDACTED]?

21 [REDACTED]: Yeah, I think we can take a break now. So it's 11:43. We'll go off  
22 the record, and let's come back at 11:50.

23 [Recess.]

24 BY [REDACTED]:

25 Q So we're back on the record at 11:52. I want to ask you some questions

1 before we get into the kind of November/December/January timeframe, just about your  
2 general views on the election. And I want to ask about how you felt at that time. And  
3 you can let me know if your ideas have changed since then. But I kind of want to  
4 understand your mindset going into November, December, January.

5 A Okay.

6 Q So, if you can start, generally, what were your feelings about the election?  
7 Do you think it was fair? Do you think it was stolen? What were your opinions at that  
8 time?

9 A From the information that I had been getting to me, it seemed like there was  
10 a lot of fraud that was not being recognized or not being talked about at that time. That  
11 was kind of my thought process, yeah.

12 Q Okay. We'll go into a little bit more specifics, but has -- did you change at  
13 all, or do you still feel the same way?

14 A No, I think that, at this point, I think that my view has definitely changed on a  
15 lot of stuff. I still -- you know, I feel like there's things that, you know, I may never know  
16 because maybe the information may never come down. But, yeah, at this point, I have  
17 moved on. I accept, you know, the election results the way they are. And we just have  
18 to move on as a country and try to figure it all out together instead of hating each other.  
19 I think that we really, really need to come together on stuff instead of the divisiveness.

20 Q What -- do you recall any kind of specific issues at that time that you were  
21 concerned about with the election or its integrity?

22 A There was some videos, I guess, of what seemed to be election fraud going  
23 around. I don't know the legitimacy of them now. I have no idea. But, at the time,  
24 that's what I had been fed and been shown.

25 Q And what were -- kind of what were the news sources or -- just maybe they



1 weren't news sources, but where were you getting that information?

2 A I guess, that's the problem with being trapped in a bubble. On either side,  
3 you get trapped in a bubble, and then you don't really get to see the outside views or how  
4 to look at things from a different angle. Until you get outside of the bubble, you never  
5 really see maybe the stuff you should have been looking at because you were trapped  
6 inside the bubble. But, I mean, it was really just information everywhere, on Telegram,  
7 on, I mean, everywhere Facebook, Twitter, everything was just feeding you whatever,  
8 whatever they wanted to feed you, whatever they knew would trigger you, and whatever  
9 you would click on, it would be fed directly -- you get more of that stuff, algorithms, so.

10 Q So most of your news then was coming from these social media platforms?

11 A Yeah, I would say.

12 Q You mentioned Facebook, Twitter, how about Parler?

13 A Parler, Telegram.

14 Q You were on Parler at the time?

15 A Yes, sir.

16 Q I imagine [REDACTED] might have a couple questions about -- on this topic?

17 [REDACTED] Not right now.

18 BY [REDACTED]:

19 Q Okay. Were -- so, given these concerns, were the -- around the election,  
20 November 3rd, were the Proud Boys involved in election efforts? So, if you can think of  
21 either working on specific campaigns or working -- or doing like poll watching, can you  
22 think of -- other than just generally attending political rallies, was there an activity  
23 directed specifically at a campaign or at the act of voting, like at a polling place?

24 A Not that I can recall or not that I was aware of, no. I think it is possible that  
25 there was, but to my knowledge, I don't know of anybody that was specifically involved in

1 any campaigns or anything like that.

2 Q Okay. So then it was just generally the going to political rallies that was  
3 kind of the form of engagement?

4 A I would say that -- that's accurate, yes, sir.

5 Q Let's talk about what you did on election day. I think you mentioned, and I  
6 think we know you were in D.C. for the election?

7 A Yes, sir.

8 Q Okay. And how did you end up in D.C., or why did you go to D.C.?

9 A I just wanted to be there. It was a historic night. And there is a bar called  
10 Harry's where everyone hangs out. And so the plan was to go up there and hang out at  
11 Harry's and watch the election results.

12 Q Okay. And who do you travel to D.C. with?

13 A One time I believe I went by myself. I drove myself up, I believe, for that.  
14 Yeah, that one I drove up by myself.

15 Q And who were you planning on meeting with there?

16 A Enrique was going. I think that's pretty much the only person that I  
17 specifically knew that was going that I can remember off the top of my head.

18 Q Okay.

19 A He said we were going to be meeting up with some other people, but that  
20 was, you know, par for the course up there, I guess.

21 Q Okay. I think we have a picture from your time in D.C. that I would like to  
22 pull up. This is exhibit 3. And we're going to just share it on the screen, so you should  
23 be able to see it.

24 And if we can zoom in just a little bit so that we can kind of see faces of people.

25 Is this -- this is a picture from that trip?

1           A    I can't be specific on the date that that was taken. I don't remember if that  
2   was November or the election. But if you know for sure that that was taken on that day,  
3   please let me know because I don't remember which date -- what time -- well, what day  
4   we went to CNN. But it would make sense since it says "Vote for Trump," that it  
5   probably would have been that that trip, yes.

6           Q    Yeah, my understanding is that this was a November 3rd trip.

7           A    Okay.

8           Q    Do you recall going to CNN's headquarters or offices?

9           A    Yes, sir. Yes, sir.

10          Q    Okay.

11          Great. Can you -- do you know all of the people in this picture?

12          A    Some of them.

13          Q    Okay. Can you point out and identify the folks that you do know?

14          A    Real names I don't. I don't specifically know. I know --

15          Q    Let's start on -- I'm going to direct you to the picture quickly. So you see  
16   the cursor is on an individual wearing black that's in front of you?

17          A    Yeah.

18          Q    Do you know who that is?

19          A    I want to say his name is Jonathan. I think that was his name, was  
20   Jonathan.

21          Q    Okay. Are these -- well, I guess, I'll ask generally first --

22          A    Not a Proud Boy.

23          Q    Okay. Not a Proud Boy. Yeah, so, when we go through and identify these  
24   people, just let me know Proud Boy or not and what their affiliation is with any group, if  
25   you know.

1           A    I don't know what his affiliation was. I just know he was friends with  
2 Enrique, I guess.

3           Q    Okay. And there are two individuals wearing MAGA hats next to you.  
4 There's one in like a bucket hat and one in more of a baseball-style cap.

5           A    Uh-huh.

6           Q    The guy with the bucket hat, do you know who that is?

7           A    I don't know his real name. They called him Chief Bowles.

8           Q    Okay. Proud Boy, though?

9           A    Yeah, I'm trying to remember it. I don't recall his real name, but they called  
10 him Chief Bowles. Yes, he was a Proud Boy.

11          Q    And then --

12          [REDACTED] Do you mind repeating that? Chief what?

13          The Witness. Chief Bowles?

1

2

BY [REDACTED]

3

Q B-o-w-l-e-s?

4

A Ah, yes, I believe so.

5

Q Okay. And then the individual in the MAGA baseball hat?

6

A His name was Brandon.

7

Q Okay. Is that Brandon Recor?

8

A Recor, yeah -- yes, sir. And he was a Proud Boy.

9

Q Okay. And then there are two women next to them. Do you know who

10 they are?

11

A By names, no, sir. I don't know their names.

12

Q Okay. Do you know generally who -- like were they associated with

13

somebody, or why -- do you know why they were there?

14

A They were there. This was all Enrique, people he knew that kind of

15

organized that thing.

16

Q What was the thing, or what did you understand it --

17

A Just to go to CNN and go stand out there with signs.

18

Q Okay. And then, obviously, I think that's Mr. Enrique Tarrio lying in the

19

front of the picture.

20

A Yes.

21

Q And then who is above him to the left of the women?

22

A I do not know who that is.

23

Q Okay. Proud Boy or?

24

A I don't think so. I don't think so. But I don't know for sure, so I can't say

25

yes or no.

1 Q Do you know --

2 A He might have been there already when we got there.

3 Q Do you know -- I'll ask, generally, are you familiar with Latinos for Trump?

4 A Yes. I've heard of the organization, yes.

5 Q Are any of these individuals associated with Latinos for Trump, as far as you  
6 know?

7 A Possibly. There's so many organizations and so many people, and I'm  
8 terrible with names and faces. But, yes, there was always pretty much a good presence  
9 of Latinos for Trump around us.

10 Q Okay. And just tell me what you know of the relationship between Mr.  
11 Tarrio and Latinos for Trump?

12 A I believe he was on the board --

13 Q Okay.

14 A -- or director, or something like that.

15 Q And do you know Ms. Gracia, Bianca Gracia?

16 A I've heard the name Bianca. I don't know the last name specifically. I  
17 don't specifically know know her. Like I didn't have her phone number. I didn't talk to  
18 her. I don't believe that was the -- there was two people named Bianca that I remember  
19 up there, and I don't think that's the one that I think I knew better.

20 Q Okay.

21 A But I heard the name, though.

22 Q And then, just to quickly move through the other people in this picture, next  
23 to Mr. Tarrio, kneeling behind the sign is a man. Do you know who he was?

24 A I don't remember his name. I'll be honest with you. I've seen him on  
25 TikTok a few times and talked to him on there. Man of justice is the only way that I

1 know his -- I'll be honest with you; I hung out with him probably three or four different  
2 occasions, and I did not get his name.

3 Q Okay. Was he a Proud Boy?

4 A No, sir, I don't think. No, no, no.

5 Q And then I think you said you don't know the two women that are next to  
6 him?

7 A I believe one is Helena.

8 Q Okay. And who is Helena?

9 A I think she's the one with her hand on his shoulder. Her name is Helena.

10 Q The one without a hat?

11 A Yes. Without a hat.

12 Q Okay.

13 A And the other person that's standing next to her, the other female, I do not  
14 know. Then the guy on the far left, I do not know.

15 Q Okay. There were some -- at this event, there were some videos taken just  
16 of you guys probably walking around. And I have a screen shot from one of the videos.  
17 I want to ask one other person. If we can pull up exhibit 10.

18 Do you recall this individual being at that event?

19 A I remember seeing him in D.C., and maybe he was there, yeah. I think he  
20 did Babies Lives Matter, I think, was like his art thing that he did.

21 Q Okay.

22 A -- the entire abortion thing. I don't remember -- I don't recall his name off  
23 the top of my head, though.

24 Q Does the name Taylor Hansen (ph) ring a bell?

25 A Taylor, yes. I didn't know his last name, but Taylor now that you say that.

1 Q Is he associated with the Proud Boys?

2 A No, he's not a Proud Boy.

3 Q Do you know who brought him there, what his connection to that group  
4 was?

5 A He probably knew Enrique. I think we -- if I can recall correctly, I first met  
6 him election night at -- or the night before election night, or the first night we got up  
7 there, which would have, I guess, would have been a Monday night at Harry's. And I  
8 was standing with Enrique, I believe, outside, and he walked up, and Enrique grabbed him  
9 and said: Hey, you're the guy from Babies Lives Matter.

10 I believe that's how they met. And they probably exchanged phone numbers  
11 and Enrique or him. It might have been his thing that he organized that Enrique decided  
12 to go to. But I'm just speculating because I don't know. All I know is someone said:  
13 Hey, we're going down to the CNN building.

14 And I said okay.

15 Q Okay. So you think he knew Mr. Tarrío and that they had met the night  
16 before?

17 A I believe so, yes.

18 Q And then you said, I think, that saw him in D.C. at other events. Is that  
19 right?

20 A November 14th, I believe, and maybe the night that I got stabbed. But,  
21 again, that night, December 12th, is a very big blur for me. From there on is very, very  
22 spotty memories.

23 Q And then you said you just drove up. Do you remember where you stayed  
24 when you went for that November 3rd trip.

25 A The Phoenix.



1           Q    The Phoenix. Okay. And we'll talk about a couple other events in D.C.  
2 obviously. But I think you frequently stay at the Phoenix, right, when you would go to  
3 D.C. --

4           A    Yeah.

5           Q    -- more generally?

6           A    Yes.

7           Q    Was there any reason for staying at the Phoenix?

8           A    It was a nice hotel, and we got it cheap because of COVID. But that's  
9 like -- like, originally, I had another place booked, the one above Harry's, the Harrington, I  
10 think it was, is where I was originally going to stay. And then Enrique was like: Hey,  
11 like I got a room over at the Phoenix.

12           And I was like: What is it?

13           He told me it was a much nicer hotel. And so I was like: Yeah, I think I'll go to  
14 Phoenix too.

15           And then it just became -- I knew I liked the hotel. That's where everyone  
16 seemed to go. They had a cool bar in it. And we got it for a reasonable price, a lot  
17 more reasonable than it probably is right now. So I could afford it. And, you know,  
18 there wasn't -- it didn't kill us financially to stay there like it normally would have.

19           Q    I was going to ask, did Enrique pay for your room at the Phoenix Hotel for  
20 November 3rd?

21           A    No, sir, I paid for my own.

22           Q    Was that always the case? Did Enrique ever pay for a hotel room for you?

23           A    To my recollection, no, I always paid for my own way, my own fuel, my own  
24 flights, my own hotel. I paid for everything myself.

25           Q    And then so I think you also started or kind of briefly addressed the story

1 where you were at a party the night of the 3rd, and that's when you left and encountered  
2 the elderly man who was being harassed by a couple of other individuals?

3 A Correct.

4 Q What was this party?

5 A No, that was at Harry's. We were at the bar at Harry's.

6 Q Okay.

7 A Yeah, it's where, you know, election night, everybody kind of met up there.

8 And they had a big party outside in the street, and that sort of stuff. So yeah -- that  
9 was -- yeah that was Harry's. I don't know which party the gentleman who was attacked  
10 was leaving, but I figured there was probably like election night parties all over D.C. It  
11 would just be my assumption.

12 Q Just to understand Harry's and the Hotel Harrington, I understand that kind  
13 of became a meeting spot for Proud Boys. Is that right?

14 A Yes, sir.

15 Q And when did that start? Do you know?

16 A Before I ever even went to D.C. I think they always kind of went there. It  
17 was like a Republican bar; more Republicans hung out there. So I guess they felt more  
18 accepted there. They knew they wouldn't get kicked out. So I think that's why they  
19 went there.

20 Q So there was already a history of Proud Boys going to Harry's and Hotel  
21 Harrington. Did that like increase over November, December, January --

22 A Yeah.

23 Q -- or it's just always a popular bar?

24 A Well, that's where they always stayed. The numbers increased on how  
25 many people would show up, obviously, yeah. But I think that's where everybody

1 always stayed was at Harry's and at Harrington.

2 Q And when you say "everybody," are you just talking about other Proud Boys?

3 A Yes.

4 Q Okay.

5 A Anytime they went to D.C. for any kind of event or to do a rally or a protest  
6 or whatever they went for, I guess, Enrique had a good relationship with, I believe, the  
7 owner's name is John. I believe they had a relationship, and there was an understanding  
8 there that they wouldn't cause any trouble there for the business. But, yeah, so I think  
9 that's where they always stayed. I never went to any other D.C. rallies or anything  
10 before -- election night was my first trip to D.C.

11 Q And then I also wanted to ask kind of the same question. You mentioned  
12 everybody would say at the Hotel Phoenix or more people started staying there. When  
13 you say "everybody," you just mean Proud Boys?

14 A No, I think there was a lot of -- there was a lot of people that stayed at the  
15 Phoenix, obviously.

16 Q Okay. Yeah. Can you describe some of the other either individuals or  
17 groups that you knew also were staying at the Hotel Phoenix kind of on a regular basis?

18 A I think some of the Latinos for Trump stayed there. But, again, I don't know  
19 what association all these other people have with any other groups. I am speculating.  
20 I may have heard, hey, that person is with Latinos for Trump, or they may have had a shirt  
21 on that said Latinos for Trump. So I would assume that they were a part of the  
22 organization, but I don't know everybody that -- that's just not my, my memory type. I  
23 can't remember what every, you know, what person was in what organization. I don't  
24 have that type of mind. Mine doesn't work that way.

25 Q Yeah, and --

1           A     I'll do the best I can.

2           Q     Right. Understood. Just to the best of your recollection. And even if  
3     you don't know for sure, but, you know, you heard from somebody, "Oh, there is a couple  
4     people from Latinos for Trump staying here," that's responsive and valuable information.  
5     So just let me know if, you know, if it's, yeah, if it's that situation where you --

6           A     Yeah, I'm not trying to -- I just want you to know I am not trying to be  
7     dishonest; I just don't remember.

8           Q     Yeah. I understand.

9                 How about, in addition to Latinos for Trump, any other organizations you either  
10    just heard about that were also staying there?

11          A     Not off the top of my head, no. I don't remember anybody else staying  
12    there.

13          Q     Other than the Phoenix Hotel and the Hotel Harrington and Harry's bar, any  
14    other kind of popular hangouts places that you congregated at as Proud Boys?

15          A     Congregated at, no; just there was usually the bar in the Phoenix or the  
16    bar -- or Harry's, is pretty much the two places that we were at. And we really -- I don't  
17    think it was widely known that we were staying at the Phoenix. It was kind of a way to  
18    avoid having our hotel room burnt down or something in the middle the night. You  
19    know, we just didn't know. So nobody really keyed in on the fact that we were at the  
20    Phoenix or really knew about the Harrington. The reason I chose to stay, once I realize  
21    that, I was like: Okay, well, if I stay over here, we're less likely to have a hotel get  
22    attacked or something like that.

23          So --

24          Q     Had that happened in the past?

25          A     I believe November 14th it did. November 14th. Yeah, November 14th, a

1 lot of hotels were attacked that night, yeah.

2 Q Okay. We can -- we'll talk about November 14th shortly, and I can ask you  
3 about that.

4 A Okay.

5 Q And then the event on November 3rd, or not the event, but the purpose of  
6 going for November 3rd, would you -- in kind of the quality of that day and the reason  
7 that you were going, would you say it was different from November 14th than like  
8 December 12th; you were just a small group going for the election as opposed to  
9 attending a large rally. Is that right?

10 A Absolutely. I would agree with that, yes.

11 Q Sorry. And then, other than you meeting with Enrique, are there any  
12 particular Proud Boys that you remember that you planned to meet for the  
13 November 3rd trip?

14 A That I knew about ahead of time, no. I did meet up with people when I was  
15 there. But that I can recall knowing were going to be there, no, I can't. I think I had  
16 heard that maybe some of the D.C. guys that were in the D.C. chapter were going to be  
17 there, but that's really all I can remember, specifically.

18 Q Okay. How well do you know the D.C. chapter? Like do you know who  
19 the president at that time was?

20 A No. I believe I met him, but I don't remember anything about him, his  
21 name, or any of that stuff.

22 Q Do you know, do chapters have sergeant at arms also?

23 A I believe some of them do yes, sir.

24 Q Some of them. Okay. Do you know if the D.C. chapter had a sergeant at  
25 arms?

1           A    I couldn't tell you. I don't know.

2           Q    And then just the last question on November 3rd, any Proud Boys that you  
3 met there that then you also saw at later rallies in D.C., like November 14th and  
4 December 12th?

5           A    Yeah, Brandon Recor was there.

6           Q    What events did Brandon Recor go to?

7           A    I think he was there November 14th and December 12th. I don't know  
8 about --

9           Q    Okay.

10          A    -- I don't know about January 6th.

11          Q    Okay.

12          A    Chief Bowles was there, I believe, both the 14th and December 12th.  
13 Actually, you know what; he might not have been at December 12th. I can't recall. I  
14 don't want to say one way or another if I don't remember. So I'm just going to say I  
15 know he was at November 14th.

16          Q    All right. So we're going to move into those events in November and  
17 December that sort of led up to January 6th. But I want to first make a distinction and  
18 ask you a couple of questions. So I understand a lot of times you would attend rallies,  
19 and part of your purpose for attending the rally was to either defend against attacks from  
20 opposition protesters, and that's one sort of activity that you might do at a rally.

21          A    Uh-huh.

22          Q    I want to draw the distinction that just on your own just showing up to do  
23 that sort of -- perform that sort of work versus going as like personal security for an  
24 individual or at the request of an organization. Does that distinction make sense to  
25 you?

1           A    Yes.  Now, are you saying going ahead of time with the intention of going  
2   to do something for another?  Or when it so happens that we get there and somebody  
3   asks us to do something?

4           Q    Yeah, well, let me just give you an example so we can be clear about what  
5   we're talking about.

6           A    Okay.

7           Q    So Latinos for Trump had a presence on November 14th, December 12th,  
8   and January 6th.  And there were individuals that went with the intention of providing  
9   security for members of Latinos for Trump.

10          A    Okay.

11          Q    And so I just want to draw the distinction between sometimes we have a  
12   hard time talking about personal security versus, you know, just showing up to protect  
13   whoever might be there.

14          A    Okay.

15          Q    Okay.  So I want to ask, were you ever asked by any organizations other  
16   than the Proud Boys to provide security for that organization or individuals that were part  
17   of the organization?

18          A    Yes.

19          Q    Okay.  And when did that happen?

20          A    November 14th, during the day, it was -- I didn't know about it ahead of  
21   time, but we all left the hotel, we walked down to -- is it Freedom Square or Freedom  
22   Park?  I can't remember the --

23          Q    Freedom Plaza.

24          A    Freedom Plaza.  That's it.  We all walked down to Freedom Plaza, and  
25   Enrique went to a hotel that was there.  The W maybe?

1 Q The JW Marriott?

2 A I just remember --

3 Q There's actually three hotels there: the JW Marriott, the Willard, and the W.

4 A Oh, okay. It was in the area of the Willard and the W.

5 Q Okay.

6 A I don't remember which hotel it was, but there was a probably about 20 of  
7 us like standing around right there. And he grabbed a couple of us. And we went  
8 upstairs in the hotel. I had no idea we were going, and then walked into a conference  
9 room and Alex Jones was there and his security team. His security team then, I guess -- I  
10 guess Enrique had, prior to going up there, had already agreed, to say: Hey, yeah, we  
11 can get some guys to walk around you and help keep the crowd off of you. Just kind of  
12 put a circle around you because Alex Jones' people, you know, wanted to run up and hug  
13 him and whatever. And so the only -- I guess what they -- what the idea was to kind of  
14 form a circle around them to keep them off of him so he could walk. And so I guess he  
15 had already arranged it. And we went upstairs. There was about five of us that went  
16 up there. And his security team came to us, and we were talking to his security people.  
17 And we were like, well, we can get probably 15, 20 guys to walk in a circle around you  
18 guys and help keep people off of him.

19 It wasn't a security in fear of anyone hurting him. It was more of like just  
20 forming a barrier from his fans to try and keep people off of him so he could walk, is  
21 how -- really how we looked at it.

22 Q Like a crowd control function sort of?

23 A Yeah, just to try to keep people, you know -- if you ever seen celebrities, you  
24 know, it would be like the Rolling Stones walking through a group their fans. They need  
25 people to, you know, keep them off. I'm not comparing Alex to the Rolling Stones by



1       any means. I'm just, you know, giving an example.

2               Q     Yeah, I understand. Do you know who his security team was or --

3               A     Names, I don't know. I had met them multiple times. Just from being at  
4       rallies, I always run into them. I remember their faces, but I don't think I ever really  
5       even caught their names.

6               Q     Do you know if they were like hired professional security, or were they also  
7       sort of like an organization that aligned ideologically and wanted to --

8               A     Yeah, I believe they were a hired professional security team.

9               Q     And then so what did you guys end up doing for Mr. Jones that day?

10              A     Like I said, probably about maybe 15 of us or so. I can't remember the  
11     exact numbers -- I'm kind of guesstimating here -- just kind of formed a circle around him  
12     with his security team, kind of extended the security team a little bit. Because I think he  
13     only had like four guys with him, and that wasn't going to be enough. So we kind of  
14     extend it around and just kept, you know, people from going off, you know, running up  
15     and impeding him from walking up to the Supreme Court. We walked to Supreme  
16     Court. We helped to make sure that he got on the stage to speak. And then at least I  
17     want to say we tried to get him to the stage. I don't know if he ended up speaking. I  
18     think he did. It was a very confusing day. And then we got him back out of there and  
19     walked not down the main drag where we would have come up from Freedom Park but  
20     the next road over. I guess, it has to be -- if I can remember -- maybe another park on  
21     the left side.

22              Q     Yeah, there's Pennsylvania Avenue that runs on the south side of Freedom  
23     Plaza. But that's fine if you have no idea --

24              A     -- you can show me the road, you can take me to the road today, and I  
25     probably wouldn't even remember it.

1           And we walked him back down to where his hotel was, and then we left.

2           Q     Okay. So you said that it seemed like -- well, I'll backtrack a little bit. Did  
3     Mr. Tarrio tell you that he had pre-arranged this security detail with Mr. Jones?

4           A     No. I don't believe so. I think --

5           Q     How did you --

6           A     He told us once we got up there. He was like: Hey, we're going to do  
7     security.

8           I mean, I had no idea we were going up there. He was like: Hey, just come on,  
9     let's go, you guys come with me.

10          Q     Do you recall who the other Proud Boys were that did that?

11          A     I do not remember offhand to be honest with you. There was guys that  
12     were like, "Yeah, yeah, I was there helping you with security on with Alex Jones," and I  
13     don't remember.

14          Q     Okay. You know, obviously, you didn't know you were going to be doing  
15     that for Mr. Jones. But did you go prepared to do some sort of security work, or were  
16     you just doing kind of the general rally protection type work?

17          A     That would be accurate. Yeah, I was just kind of -- we always went with the  
18     thought of you may have to like step in between somebody. You may have to put  
19     yourself in between somebody else, you know, to stop them from getting hurt or to stop  
20     a fight from happening or whatever. So, yeah, you may have defend somebody else.  
21     So I always kind of went with that, that mindset that I may have to defend somebody  
22     else.

23          Q     Were there any other times -- so November 14th providing security for Mr.  
24     Jones, any other times that you can recall like that where you were asked to specifically  
25     provide security for a person or a group?

1           A     Not that I can recall other than I know Enrique had one of his girlfriends  
2     there, one of the many, and I don't remember -- I can't remember her name.     But,  
3     anyway, like she would just kind of be close, and I would always just keep an eye on her,  
4     make sure nobody came up and, you know, assaulted her because she was a tiny little  
5     female.     So, obviously, you know, when there's females around, I always tried to make  
6     sure that there was -- you know, I always kept an eye out there.     I'm protective over  
7     women, so.

8           Q     Okay.     No other kind of celebrities or VIPs that you remember providing  
9     security for?

10          A     No, sir.     Not that I can -- not that I can recall, no.

11          Q     How about hearing about Proud Boys doing security for other celebrities or  
12     VIPs?

13          A     I've heard about it before, yeah.

14          Q     And what individuals do you recall?

15          A     Ann Coulter.

16          Q     When was that?

17          A     I think that was back in like 2016 or 2017, maybe.     It was way back when  
18     they did it for Anne Coulter.     Kyle Rittenhouse.

19          Q     For all these people, if you can just give me -- if know a timeframe or like a  
20     specific event that you're thinking of that Proud Boys did that sort of security work?

21          A     Kyle Rittenhouse was, I believe, January 5th maybe.     I think it was the day  
22     before that because he had a hearing, and they had put his lawyer's office out in like  
23     antifa circles, and there was a threat that they were going to try to kill him or something  
24     at his lawyer's office.     So I believe it was January 5th or 4th.     I don't remember the  
25     specific day.     But, yeah, there was a group of Proud Boys --

1 Q 2021?

2 A What's that?

3 Q 2021?

4 A Yeah, I believe so. I believe it was 2021.

5 Q Like at the same time as January 6th?

6 A Yeah, yeah.

7 Q Okay. Anybody else that you're thinking. How about Roger Stone?

8 A I'm sure they have. I know -- I've heard multiple times that they just go  
9 hang out with Roger. I didn't know they were doing actual security for him.

1

2 [12:27 p.m.]

3

BY [REDACTED]:

4

Q So just on the topic of Mr. Stone, I know -- are you familiar that he has

5

before publicly, has made the -- let me back up.

6

To become a member of the Proud Boys, to be first degree, there's like a public

7

statement that you have to make, right? Is that correct?

8

A There's more that goes into it than that, yes. But, that's one of the things,

9

yeah.

10

Q Okay. And are you aware, have you seen that Roger Stone has made that

11

statement publicly?

12

A I wasn't actually. I didn't know that he was.

13

Q Okay. I mean, is -- I guess the upshot of that, all that questioning is, is

14

Mr. Stone a Proud Boy or is he considered a Proud Boy?

15

A To my knowledge, no.

16

Q What else do you have to do after, other than making the public statement?

17

A Well, you would've had to go through, like, a vetting. Each chapter has

18

their own vetting process. So you would've had to go through vetting and spend a

19

certain amount of time in the chat room seeing how you interacted with other people

20

before whoever did the vetting for that particular chapter would say, okay, yeah, we'll

21

give this guy his first degree.

22

Q Okay. And then what did you -- when you were going to a rally and you

23

know that you might put yourself in between a counterprotester and a protester, what

24

did you do to prepare for that?

25

A Depended on what the threat was. Usually I would wear a tactical vest

1 with a stab plate in it, which obviously didn't work in my case.

2 Q I take it that you purchased that vest on your own?

3 A Yes.

4 Q Okay. Did the Proud Boys ever help members buy this sort of protective  
5 gear?

6 A I'm sure, yeah.

7 Q Okay.

8 A Yeah, I'm sure they have.

9 Q That's what some of the fundraisers were for at times? Is that correct?

10 A It depends. Each fundraiser was different. I know a lot of guys just went  
11 and purchased them on their own. Everybody had -- would just go out and -- they're not  
12 expensive. They're not, like, really ridiculously expensive. You can go buy a vest on  
13 Wish.Com or something for probably \$25 bucks that will ship to your house. So it's not  
14 like they were thousands of dollar vests. But I'm sure at some point -- yeah, I'm sure at  
15 some point that they did.

16 Q Oh, at some point somebody did, yeah.

17 A Yeah.

18 Q Yeah, I gotcha. Okay. And then just still kind of speaking generally, were  
19 there any other groups or organizations that you knew of that were doing the same sort  
20 of either rally protection work or personal security work either at the November,  
21 December, or any other events around that time?

22 A That I knew specifically of doing something? No.

23 Q Okay.

24 A I can make my assumptions. But that I knew specifically of anybody else  
25 doing security for anybody else, no.

1           Q    Okay. We'll talk some more about these groups, but I'm just going to name  
2   them and tell me what you know about them and kind of what your -- just give me an  
3   idea of your knowledge of these groups.

4           So the first is a group called First Amendment Praetorians. Have you ever heard  
5   that name?

6           A    Never.

7           Q    Okay. Sometimes they just go by 1AP.

8           A    Never.

9           Q    All right. Oath Keepers?

10          A    Obviously, yes, I've heard of the Oath Keepers.

11          Q    Okay. I want to distinguish a little bit from what you've learned about the  
12   Oath Keepers recently and what you knew at the time.

13          So going back to November of 2021 for that November 14th event, were you  
14   aware of the Oath Keepers at that time?

15          A    I had heard of them, but up to that point everyone called them the Oath  
16   Breakers. So it wasn't like they were on friendly terms with us.

17          Q    Why were they called the Oath Breakers?

18          A    I guess they had -- in the Pacific Northwest they agreed to go out and show  
19   up to a few rallies and said they were bringing a couple hundred people. And then they  
20   would just not show up and leave guys kind of, for lack of a better term, peeing in the  
21   wind.

22          So I guess there was definitely some animosity between the Proud Boys and the  
23   Oath Keepers. I don't think that they were very friendly at the time.

24          Q    Okay. And who -- who did you --

25          A    And mind you -- hold on, let me stop you there for a second. That is all

1       hearsay. It's just what I heard through the grapevine. I have no personal knowledge of  
2       any actual events where that happened. That was just what I was told.

3               Q     Got it. And who told you that, or do you remember who you heard that  
4       from?

5               A     I couldn't remember, to be honest with you. There's groups with  
6       thousands of people in them. Somebody could've called them that.

7               Q     Okay. In the November, December, January time frame, so, like,  
8       November 14th up to, like, January 6th, did you ever hear Mr. Tarrio talk about the Oath  
9       Keepers?

10              A     Not that I can recall, no.

11              Q     Okay. And then did he -- do you know if he was aware of or knew or had  
12       feelings about the situation in the Pacific Northwest where you said the Oath Keepers  
13       were supposed to show up in numbers and then just didn't appear? Did you ever hear  
14       him talk about that?

15              A     I don't remember hearing him talk about that, no, sir.

16              Q     And then we'll talk a little bit more about Oath Keepers later, but how about  
17       just another group, the Three Percenters?

18              A     I've heard of the Three Percenters, yes.

19              Q     Okay. And what do you know of the Three -- or about the Three  
20       Percenter?

21              A     I don't know much, to be honest with you. I know that they drive around  
22       with little stickers on the back of their car. And I don't know that they're a militia that I  
23       know of. I just know that they were very loose knit -- I mean, people wore the  
24       Three Percent thing all the time, so I don't know if they were like a specific group or not.  
25       I had heard that they were, then I heard that they weren't. I don't specifically know that



1 much about the Three Percenters.

2 Q Do you know if there was -- do you know of any members of the Proud Boys  
3 that also identified as Three Percenters?

4 A It's possible, but specifically, off the top of my head, no.

5 Q Do you know of a Proud Boy with the last name Geeseweine (ph)?

6 A The only way I know him is from being in the news. He was a guy that  
7 looked like Gavin apparently.

8 Q I think -- yeah, I do think people have drawn that comparison.

9 A Yeah.

10 Q Okay. And then I know you said you purchased your protective gear -- well,  
11 actually, I think you've already answered that. I'll move on.

12 You talked about providing personal security for Mr. Jones. Do you recall Proud  
13 Boys providing personal security for Latinos for Trump or any members of Latinos for  
14 Trump?

15 A Yes.

16 Q Okay. And when was that?

17 A It was one of the rallies. I don't specifically remember which one. And I  
18 remember, they weren't specifically -- and I don't remember if at the time they were  
19 Proud Boys or not. I think eventually they were, but I don't know. I think they were.

20 But they were protecting, I guess, one woman. There was two guys from Florida  
21 area, and I don't remember their names, but they were protecting a woman.

22 Q Does the name George Meza or Asher Meza ring a bell, or Rabbi Meza or  
23 Rabbi Asher --

24 A Yes, I know who Asher is.

25 Q Okay. He has a lot of names. Rabbi -- generally rabbi something. Okay.

1 And was that one of those two individuals?

2 A I don't know, to be honest with you. I can't recall, to be honest with you, if  
3 he was one of them or not.

4 Q Okay. All right. So then focusing on now specifically the November 14th  
5 event, how did you get up to the November 14th rally?

6 A Drove.

7 Q Drove. And did you drive by yourself?

8 A November, I think I drove my car, and I picked up my friend Bill.

9 Q And is Bill a Proud Boy?

10 A Yes.

11 Q Okay. What's -- do you know Bill's last name?

12 A Whicker.

13 Q Okay. And then what was -- kind of what was the purpose behind going up  
14 for November 14th, or what did you think you were going to do?

15 A Going to protest. We were going to protest.

16 Q And just generally, what were you going to protest? What was  
17 your message that you were trying to get out?

18 A What we believed was fraudulent election results.

19 Q What were your conversations with -- did you coordinate your plans with  
20 Mr. Tarrio, first I'll ask --

21 A Yes.

22 Q -- on November 14th? Okay.

23 And do you know how he got from -- was he in Florida at the time when he went  
24 up for November 14th?

25 A Yes, I believe so.

1 Q And do you know how he got from Florida to D.C.?

2 A Probably flew. He usually always flew. He never really drove.

3 Q Okay. I'll just represent to you that we've seen documents, talked to  
4 witnesses that said that Mr. Tarrío flew on a private plane with some other Proud Boys up  
5 to D.C. for the event on the 14th. Do you ever remember hearing anything about that?

6 A I remember hearing it. For some reason I thought it was the December  
7 12th one that they flew up for on the private jet.

8 Q Okay.

9 A Yeah, I think that -- I can't be specific, but I thought that's -- I thought it was  
10 for the 12th one, but maybe it was for the 14th.

11 Q Did you ever hear about how that was paid for? I mean, was it normal for  
12 Mr. Tarrío to fly on a private jet?

13 A Not that I knew of. But, like I said, I mean, I've said this multiple times,  
14 Enrique plays everything pretty close to the chest, always has.

15 So I -- again, we didn't -- I didn't know about the plan to escort Alex Jones until we  
16 were literally standing in the room with him. He just didn't tell -- at least didn't tell me  
17 much.

18 Q Okay. So then other than just noting that Mr. Tarrío had flown on a private  
19 jet either for November 14th or December 12th, you don't know anything about details of  
20 how that was paid for?

21 A I think I specifically remember someone saying they split it between  
22 everybody and that it wasn't that expensive. Because I was like, how are you guys  
23 affording a private jet? And I think I remember someone saying that they had split it.  
24 But again, that's hearsay. So my on-the-record answer would be I don't know how it  
25 was paid for.

1 Q Okay. Then I guess I'll just -- I can also represent to you, having spoken to  
2 witnesses that -- or individuals that flew on that plane with him, they didn't split the  
3 plane and other individuals didn't know how it was paid for. So, I guess --

4 A Seems like par for the course.

5 Q Yeah, I guess that's kind of what I'm asking. Or why would you say that's  
6 par for the course? What about that is kind of typical?

7 A Just the playing things close to the chest, not telling anybody what's going  
8 on.

9 Q And that's typical of Mr. Tarrio?

10 Mr. Wellborn. Yeah.

11 The Witness. Yeah. Yeah, I mean -- - yeah, I've said that before, yeah.

12 BY [REDACTED]:

13 Q Okay.

14 A Not a secret.

15 Q What -- I'm assuming there are a couple incidents or things that led you to  
16 that conclusion that he was playing things close to the chest or wasn't telling you  
17 everything. What are -- are there any other specific incidents you're thinking of where  
18 you've now found out he was playing something close to the chest?

19 A Specifically, I guess I would say the -- yeah, I guess, the Alex Jones thing,  
20 the -- obviously, the 1776, what was it, the 1776 revised -- revisited or something?

21 Q Returns.

22 A Returns, yeah. Yeah, that was very close to the chest, obviously.

23 I'd say just a lot of stuff. You never knew what move he was making. He kind  
24 of had the -- we called him the sewer rat because he would literally drop -- he'd be  
25 standing next to you and then you'd turn around for a second and he was gone and he

1 was off doing something else with somebody else, and you just never knew what he had  
2 going on.

3 Q And then when you said the Alex Jones thing, you're talking about providing  
4 security on the 14th, that was just kind of a surprise and you didn't realize --

5 A Yes, sir.

6 Q -- he had arranged that?

7 A Yes, sir.

8 Q Was that a problem or controversial at all?

9 A I don't think so. I don't think so. I think we all -- I mean, I thought it was  
10 pretty cool. You know, I used to watch Alex back when he had hair. So it was pretty  
11 cool to be able to, I guess, be there and meet him and whatever.

12 But, yeah, I don't think it was much of a big problem, because it wasn't like he  
13 was, that I knew of, paying for security for us. It was just something that we chose to  
14 do.

15 Q Okay. Other than the providing security for Mr. Jones, did you get a sense  
16 from any other interactions or anything else that Mr. Tarrio was involved in that he was,  
17 like, involved in the planning and organization of the November 14th event?

18 I'll stop there and let you answer that question, but I can get a little bit more  
19 specific for you.

20 A Yeah, if you can, because I don't know if you're talking about planning for  
21 the whole event or just planning for what the group was supposed to do.

22 Q I mean planning outside of just what the Proud Boys were going to do. So  
23 there were various organizers of the November 14th event. One of them -- and we can  
24 run through a couple of them and you can tell me if you're familiar with these  
25 organizations -- but one of the primary ones was a group called Women for America First.

1 Have you ever heard of that group?

2 A I have not.

3 Q Okay. And then I'm going to name a couple people that are associated with  
4 that group, individuals, and just let me know if you're familiar with their names or if you  
5 know who they are.

6 A Okay.

7 Q Amy or Kylie Kremer?

8 A I don't know that name.

9 Q Okay. And then also associated with Women for America First is a man  
10 named Charles Bowman. Do you know Charles Bowman?

11 A I do not.

12 Q Okay. And then the Chafians, a husband and wife, Cindy and Scott  
13 Chafian?

14 A I do not know them, no, sir.

15 Q Okay. And then other than Alex Jones, a couple other individuals.  
16 Did you -- or do you know of any Proud Boys interacting or doing anything with  
17 Roger Stone for the November 14th event?

18 A No, sir, I didn't. I don't even know if Roger was there, to be honest with  
19 you, that I can remember. I don't remember him being there.

20 Q Okay. And then we haven't talked about him yet, but do you know Ali  
21 Alexander, or do you know who he is?

22 A I have met him, yes, sir.

23 Q Okay.

24 A Briefly.

25 Q Okay. And he is the leader of an organization called Stop the Steal. Is

1       that right?

2           A     I thought he was the leader of Blacks for Trump.

3           Q     Okay.

4           A     That's what I thought, but I know there was a -- I don't know if there was an  
5       organization called Stop the Steal. I thought Stop the Steal was just the name of, like,  
6       the protest on November 14th, I think it was.

7           Q     For purposes of the kind of later discussions, there is an organization called  
8       Stop the Steal.

9           A     Okay.

10          Q     And Mr. Alexander is a leader of, associated with, founded that movement  
11       or that -- sorry, not the movement, the organization.

12          A     Okay. Roger that.

13          Q     And then you said that you have met Mr. Alexander?

14          A     Yes. I wouldn't say been formally introduced, but I -- I don't know if he was  
15       at the dinner in Atlanta or not, but I saw him in Atlanta at one of the rallies in Atlanta, the  
16       one that happened at the Statehouse, I guess it would be considered, the capitol there.

17          Q     Yeah. And that was just shortly after the November 14th election, I think,  
18       on November 18th. Is that right?

19          A     Yeah, it was just a few days after that November 14th thing, yes.

20          Q     All right. We'll talk about some of the details of that next. Okay.

21                And then for the November 14th event, I know you said you just generally knew of  
22       the Oath Keepers and had heard them referred to as Oath Breakers.

23          A     Uh-huh.

24          Q     Did you interact with any Oath Keepers on November 14th or hear about  
25       Oath Keepers being present?

1           A    I believe a few guys walked by us in, like, full-on tac gear, like full-on, I'm  
2 talking Kevlar, helmets, all that stuff, very larky like, and obviously no weapons. But  
3 they -- I think I heard someone say those might be the Oath Keepers.

4           That's really the only interaction that I've really ever had with the Oath Keepers.  
5 They walked by and, like, fist bumped everybody or something like that. But that was  
6 about it. That's the extent of it.

7           Q    Okay. Do you know -- do you now know who Mr. Stewart Rhodes is?

8           A    I have never met him. I've never seen him in person that I can recall. I  
9 think the only time I've ever heard of him is after he was arrested.

10          Q    Okay. And so you never heard Mr. Tarrío talk about Mr. Rhodes or any  
11 opinions about him?

12          A    No, sir.

13          Q    Okay. All right. So then let's, if we can, just kind of walk through the day  
14 of the 14th.

15                I know you said you were around Freedom Plaza, went into the hotel with  
16 Mr. Tarrío, met the security team, and ended up just kind of following Mr. Jones around  
17 that day and providing some crowd control and security.

18                Any other -- what else happened that day, if you want to maybe start in the  
19 morning and lead me up to when you met Mr. Jones?

20          A    Morning time we met up at Harry's like we always do in the morning.  
21 Everybody kind of came down to Harry's. We hung out there for a little bit.

22                Then everyone kind of formed up, and we walked towards -- we stopped at  
23 a -- maybe a Walgreens or something. And I remember it being funny because  
24 somebody -- one of the people that hated us, I guess, tweeted the Proud Boys are on the  
25 move and then -- or they're marching and then dot, dot, dot, towards Walgreens.



1           So I think we stopped at Walgreens because somebody had to get cigarettes.

2           And so there was a crowd of a few hundred people marching together and then they all  
3           stopped at Walgreens.

4           And then we made our way to Freedom Plaza.   We walked into Freedom Plaza.

5           That's when the whole meeting with Alex Jones took place that I just explained to you.

6           We walked Alex Jones --

7           Q    Let's stop there for just one second.

8           A    Okay.

9           Q    So you said the group of Proud Boys for that day was a few hundred?

10          A    No.   I don't think there was that many, but there was a lot of other people  
11          there that weren't Proud Boys that marched alongside of us and behind us, yeah.

12          Q    Okay.

13          A    And, unfortunately, in front of us, because I trip ad few times.

14          Q    Do you know, was there some other, like, uniting factor, or why did these  
15          other people join you in that march?

16          A    I don't know specifically.   I think people were just kind of filtering down  
17          that area and then they would -- they saw all of the commotion over there by Harry's, so  
18          they all kind of just fell in.   And then when we started taking off marching down there  
19          everybody just kind of fell in behind us.

20          Q    Okay.

21          A    I think that -- I mean, unless it was organized without me knowing about  
22          that, but I think that's probably what happened.   That's usually what happened when we  
23          went.

24          Q    About, if you have a guess, do you have a guess at how many Proud Boys  
25          met for that event in that march that you're talking about?

1           A    I'd say maybe 200, maybe.

2           Q    Okay. Two hundred Proud Boys and then plus another couple folks that  
3 just joined you?

4           A    Yeah. It could've been more, honestly, I just -- I don't remember.  
5 Obviously December 12th was a lot larger. But I think in real -- real, honest numbers,  
6 there was probably two, maybe two hundred Proud Boys, 175 or something.

7           Q    Okay.

8           A    Obviously it was -- it was blown up whenever anybody said, oh, yeah, we had  
9 500 Proud Boys there. The numbers were kind of expanded.

10          Q    This might be an opportunity to introduce a term, and let me ask you about  
11 it. Do you use the word "normies" or term "normies"?

12          A    Yes, sir.

13          Q    And what does that mean to you?

14          A    A normie would just be a regular just Trump supporter who may not -- like a  
15 boomer or just something of that nature, just a normal -- somebody who wasn't in the  
16 Proud Boys or somebody who wasn't just -- they agree with everything, they just weren't  
17 in the Proud Boys.

18          Q    Right.

19          A    Just that would be a normie, I guess.

20          Q    So just unaffiliated. Would you call an Oath Keeper a normie or is it just --

21          A    No, I don't think so. I don't think I would've referred to them as a normie.

22          Q    So a normie is just an unaffiliated Trump supporter, MAGA individual?

23          A    Yeah, I would say that, yeah.

24          Q    Okay. So a bunch of normies joined the Proud Boys on the march to  
25 Freedom Plaza?

1           A    Yeah, I would say that.   And a lot of it was media too.   A lot of the crowd  
2   was media.

3           Q    All right.   Then, sorry, you can go ahead.   So you went to Walgreens, went  
4   to Freedom Plaza.

5           A    Yep.   Then we met up with Alex Jones, walked him to Supreme Court.   I  
6   believe he spoke --

7           Q    How -- sorry, not to interrupt you again.   How -- do you know how the  
8   group was selected to be the folks that provided security for Jones?

9           A    It was just the people that happened to be standing around when we walked  
10   outside.

11          Q    Okay.   Was it people that were particularly close to Mr. Tarrio or just  
12   really --

13          A    They were just random guys that were wearing black and yellow he just  
14   grabbed up and said, hey, come on, come walk with us.

15          Q    Okay.   And then sorry I interrupted you.

16          A    That's okay.

17          Q    So you met up with Alex Jones?

18          A    Uh-huh.   Walked him up to the Supreme Court.   He spoke, to my  
19   recollection, he spoke.

20                Then we went down the back road -- the back way, walked him back towards the  
21   hotel.   Happened to catch Trump's motorcade coming up, so we kind of rushed back to  
22   Pennsylvania Ave, I think it was that he drove down, caught him going by.

23                And then kept walking to -- we got him close to his hotel.   And then we split off  
24   and walked back to the Phoenix from there.   We may have stopped at Harry's for a few  
25   minutes, and then we walked back to Phoenix after that and everybody kind of went back

1 to relax.

2 Q How -- so that's during the daytime.

3 A Yes.

4 Q Were there any interactions with counterprotesters as that day went on,  
5 that you can recall, during the day?

6 A That I witnessed personally? The only interactions with the  
7 counterprotesters that I remember is when we got close to Supreme Court. I was busy  
8 kind of trying to help navigate through the crowd to get Alex to the stage, but I remember  
9 there being a group of probably 50, looked like black bloc/antifa members on the other  
10 side of a barrier. And everyone was kind of just yelling at each other back and forth.  
11 But I didn't really engage because I had other stuff going on.

12 So that I witnessed during the day? Not much, no. Maybe a couple of people  
13 standing with a sign, that maybe somebody would go up and talk to them about their  
14 sign. But that -- I think -- actually, I think, now that I recall, somebody -- and I don't  
15 know if it was -- I don't think it was one of our guys, but somebody snatched a sign from  
16 someone and we made him give it back because -- yeah, yeah, I think that was the case.

17 I think that happened at -- during that rally, during the day. But that's really the  
18 only thing that I can remember.

19 Q Okay. So then you went back to the Hotel Phoenix and kind of folks  
20 dispersed to their hotels. Did you meet up again that night?

21 A Yes.

22 Q Okay. And walk me through the night if you can.

23 A Well, we weren't planning on it, we weren't planning on going back out.  
24 We were planning on everyone just going back to the hotel, getting some dinner. We  
25 had been out for probably 6, 7 hours walking nonstop, sweating, so we all just wanted to

1 go back.

2 I hadn't eaten. We were supposed to go down to the restaurant in the hotel and  
3 go -- just get some food, have some drinks, call it a night, and everybody just stay inside.

4 And we started seeing videos come across and messages from everybody saying,  
5 hey, they're down here at Harry's attacking the bar. And we started -- they had -- I  
6 guess the black bloc protesters had -- or counterprotesters, I guess you would say -- had a  
7 bunch of people penned up in a, I guess, a store or something. They were throwing  
8 fireworks into the store, like the mortars that they throw at people. They were  
9 throwing mortars there. They were throwing mortars at people eating outside the  
10 restaurants.

11 And so we all kind of collectively said, hey, let's get prepared in case we've got  
12 to -- something goes down here at the hotel, in case they come up here. And that's  
13 when we heard, I guess, that they were trying to set the whatever hotel Alex Jones was  
14 on -- was in -- on fire. They started fires in the lobby.

15 And so that's when everybody said -- everyone was, like, okay, let's just all go back  
16 down to Harry's. They were outside of Harry's trying to break through the police line to  
17 get to the guys that were -- that had been staying at Harry's.

18 And so it became kind of, I guess, one of those nights where we kind of just  
19 walked around. We went down to Harry's, met up with a lot of other people, and then  
20 we just kind of walked around the city trying to keep them occupied so they weren't  
21 assaulting or trying to burn people -- burn down hotels and stuff. So, yeah. And that's  
22 when we ended up meeting up with them.

23 Q Do you guys refer to that kind of activity as, like, a night march? Have you  
24 heard that term before?

25 A Yeah, I guess you could say night march, yeah.

1           Q    Okay. And then, so other than the events you just described, any particular  
2 interactions between Proud Boys and counterprotesters, antifa, black bloc, whatever  
3 group --

4           A    Oh, yeah, absolutely, there was a lot that night.

5           Q    Okay. Let's try to quantify it a little bit. Do you have an idea of how many  
6 kind of violent interactions, let's start with that, not just kind of yelling at each other but  
7 actually fights that Proud Boys and counterprotesters engaged in?

8                I want to -- and let me preface this with, I kind of just want to understand a little  
9 bit to compare November 14th to December 12th and understand was one event more  
10 violent than the other. I think I know from your perspective what the answer to that  
11 question is, obviously, but --

12          A    Actually -- actually, on my -- I felt like November 14th was more violent.

13          Q    Okay.

14          A    They were -- I guess the counterprotesters were a little bit more bold and  
15 that sort of thing, cornering people in lobbies and stuff like that.

16               And so we -- when we went out we stopped. And I'd say there was probably  
17 three or four that I can recall kind of -- well, I'm probably -- if you break it down, it's  
18 probably two different episodes, but they happened within like 5 to 7 minutes of each  
19 other. And after that it was all done. Like, they all went home, we all went back to the  
20 hotels, and that was it.

21          Q    What are those two episodes that you're recalling?

22          A    The one episode is when they were trying to burn down a hotel. I can't  
23 remember the name of the hotel. We had been walking around and we found them  
24 there.

25               I guess Enrique had some guys undercover that were marching with that group

1 and sending him back locations and what was happening and kind of reporting back, hey,  
2 they're over here trying to burn down this place. They were all undercover in masks,  
3 and they thought that they were part of that group.

4 So he was like, hey, they're over here trying to burn down this hotel or whatever  
5 he was -- information he was being fed. He didn't tell anybody, but he just kind of  
6 marched in whatever direction.

7 And when we got there to them, immediately, as soon as they saw us walking up,  
8 they started hurling projectiles at us and spraying pepper spray or bear mace or whatever  
9 they had towards us.

10 And that's when pretty much a big confrontation happened in the middle of the  
11 street in front of the hotel. Yeah, I remember I got hit with pepper spray, a rock, and a  
12 water bottle all within about 7 seconds of just walking.

13 So, yeah, I'd say it was pretty violent.

14 Q Okay.

15 A On a whole, I would say that was more violent than December 12th.

16 Personally, no, I'd say mine -- my experience was worse on December 12th.

17 Q Would you say -- what was the Proud Boys' kind of impression walking away  
18 from November 14th of how that day or that event went? I'll start there generally.

19 A I would say, as a whole, the group felt like we defended people who couldn't  
20 defend themselves. We stopped possibly people dying in the hotels from being burned.  
21 I'd say that was kind of the general consensus.

22 Q Was there a feeling at all that the Proud Boys were, like, caught off guard or  
23 were less prepared than they should have been or that, like, when you come back for  
24 December 12th you needed to be more prepared?

25 A I don't think that I ever got that impression, no.

1 Q Okay.

2 A Not that I -- not -- no. I just think we weren't -- I mean, we'd been through  
3 stuff like that before with counterprotesters hurling bricks and stuff at us before. We've  
4 been through that.

5 So I just didn't know -- I personally didn't think that they would be literally trying  
6 to burn down hotels with people in them. So it was -- and watching people outside just  
7 sitting on a patio getting a mortar, a giant mortar thrown right at their table and blow up  
8 in their face. I mean, that was different for me. I was like, I wasn't expecting that,  
9 but -- I mean, I should have, but I didn't.

10 But, yeah, I'd say they -- they don't -- I don't think they went into  
11 December 12th -- or the group did -- thinking that they were underprepared the last time.

12 Q All right. Any questions from my other colleagues about November 14th  
13 before I move on?

14 Okay. Hearing none.

15 Okay. So then, let's move to that November 18th rally. And that was in  
16 Atlanta, Georgia, right?

17 A Yeah. I don't know the date, but you probably do. I think that was the  
18 date.

19 Q Okay. Yeah. But it sounds about right, a couple days after  
20 November 14th?

21 A I would say that, yeah, that's correct. That's accurate.

22 Q And how did -- so given that it was just a couple days, did you, like, travel  
23 straight down to Atlanta? Did you stop at home?

24 A No, I stopped at home.

25 Q Okay. And what was the plan for Atlanta?



1           A     Well, I didn't have to work, so I was, like, okay, well, Enrique said he was  
2 going to be down in Atlanta. I was like, oh, heck, I'll come up and meet you.

3           I didn't really know, I don't think, what was really happening. He was just like,  
4 hey, I'm coming down to Atlanta. They've got an event in Atlanta we're going to -- I'm  
5 going to go to. I was like, well, heck, you're only 3 hours from me. I'll come down and  
6 meet up with you.

7           So it was really just me, him, and like maybe one other guy that went to that.

8           Q     Who's the other guy?

9           A     I think his name was Pierce.

10          Q     Okay. Do you know -- is that a last name?

11          A     I -- no, I don't know if that was his first or his last name. I think he used to  
12 have a podcast, maybe Blackballed podcast, maybe.

13          Q     So I know that -- correct me if I'm wrong -- I think you said the first time you  
14 met Mr. Tarrio was early 2020 when you were organizing some flag waving events?

15          A     No, I didn't meet him there. I didn't meet him yet. I talked to him on the  
16 phone.

17          Q     Sorry. That's when you first started communicating.

18          A     Yes.

19          Q     Okay. And then I guess you attended some events together over the  
20 summer, spring and summer?

21          A     Yes.

22          Q     Okay. And at this point, so now you've been to D.C. on November 3rd, on  
23 the 14th, then you go to Atlanta on the 18th, and we'll talk about D.C. on the 12th a little  
24 bit, but that's kind of a lot of events with Mr. Tarrio. It sounds like you were meeting  
25 him specifically at all of those events, and I'm not hearing a whole lot of other people that

1       were kind of in that.

2               I guess what I'm asking, was there anybody else that was kind of part of that group  
3       of you and Mr. Tarrio that were kind of frequent attenders of these -- attendees of these  
4       events?

5               A     The D.C. one was usually always the same crowd.   The Atlanta one was  
6       different just because it wasn't as big and not a lot of people were going there.

7               But the Atlanta one, obviously, Alex Jones was there.   I believe Nick Fuentes was  
8       there.   I think.   Yeah, I do remember Nick Fuentes being there.   I think that was Nick  
9       Fuentes.

10              But, yeah, there's -- there's -- but D.C. was usually always kind of the same crowd  
11      of guys that would go.

12              Q     Okay.   And so I just want to continue to try to understand your and  
13      Mr. Tarrio's relationship.

14              At some point you said that you think you loved him a lot more than he loved  
15      you --

16              A     Yes.

17              Q     -- or at least more than he loved you.

18              A     Yeah.

19              Q     Around this time did you have that feeling?   Or what's the relationship  
20      between you and Mr. Tarrio around November?

21              A     No, I don't -- I don't think so then.   I don't think -- honestly, I don't feel like  
22      that happened, that feeling came on until a lot later when I started realizing, way after all  
23      of the January 6th events, I started realizing like, whoa, wait a minute, there's a lot of  
24      stuff he didn't tell me about, and that sort of thing.   So that's when really that feeling  
25      came through.

1 But at the time I thought, yeah, I mean, obviously we were -- we seemed pretty  
2 tight. But looking back, again, now I would say you don't keep certain information from  
3 somebody that you consider a friend.

4 Q Yeah. Are there -- were there other Proud Boys that you would think of as  
5 Mr. Tarrio being as tight or tighter with around that time?

6 A Biggs. Rufio. That was -- and at that time Joe Oakman was gone, but Joe  
7 Oakman was always his -- always right there with him too. Yeah, that was always like  
8 the really core group of guys, Nick Ochs, all those guys.

9 Q Okay. And so for that group that you're describing, how was your  
10 relationship with them? Did you have independent relationships with them or was it all  
11 through Mr. Tarrio?

12 A Most of it was through Tarrio. Rufio and I barely spoke before  
13 December 12th when I was stabbed. I mean, we were in a couple of chats together.  
14 Biggs really didn't associate with anybody. He always kept to himself. If it wasn't  
15 Enrique, he wasn't really talking to them.

16 But, yeah, I mean, that's -- that was pretty much the crew of guys that were  
17 always together. You can see every -- pretty much every event they were always there  
18 planning it. They were always planning the events.

19 Q Why did Mr. Biggs keep to himself?

20 A I couldn't tell you. I don't know.

21 Q Just his personality or was there --

22 A I would assume so, yeah. He just liked to be -- I know he had  
23 some -- maybe some PTSD stuff, got a Purple Heart or something. I think he just didn't  
24 like big crowds or didn't like having a large group of friends is how I would have to  
25 assume.

1           Q    Do you know the relationship between Biggs and Alex Jones?  Are you  
2   familiar with --

3           A    I didn't know Biggs worked on InfoWars, but I guess he did.  He used to  
4   work -- is he like a reporter or something?  I didn't know him then.  I didn't even know  
5   who he was then.  I didn't really watch InfoWars then.

6           Q    Okay.  So at that time it didn't come up or you -- did you ever interact with  
7   Biggs and Alex Jones together?

8           A    No.

9           Q    All right.  Okay.  So November 18th rally in Georgia.  You said you went  
10   down with Mr. Tarrio because you just didn't have work and you were able to meet him  
11   down there with another individual named Pierce.

12           What did you understand that event to be?  Do you know who organized it?

13           A    I don't.  I think it was -- I didn't know whose it was, honestly.  It might  
14   have been another Stop the Steal or something like that rally.  But I wasn't sure who  
15   organized it.

16           Q    Okay.  Who -- did you guys -- did you three meet up with anybody else or  
17   any other organizations?

18           A    Down there, that night after the rally we met at, I believe it was Hooters in  
19   Atlanta with Alex Jones and a couple of his security guys again and had dinner down there  
20   and that was about it.  But, like I said, it wasn't a big rally and it was kind of more just a  
21   hanging out thing.

22           Q    Couple questions about that rally.

23           Do you recall Mr. Jones and some other individuals, kind of leaders of that event,  
24   going into the State capitol on that day?

25           A    Yes.  Yes, I do.

1 Q Okay. Tell me what you remember about that.

2 A Just that everybody had to make sure that -- they had to empty all their  
3 pockets. They had to leave everything outside. And they went in there for a few  
4 minutes. And that's about all I recall really. I wasn't in there. I didn't go in, so I  
5 stayed outside.

6 Q Okay. When you said they emptied all their pockets and they went in, was  
7 it your understanding that they were -- like, they were allowed in and they were going  
8 through security to get in?

9 A Yes, sir. Yes, sir.

10 Q Okay. And then do you know who that group was that went in?

11 A I don't.

12 Q Okay.

13 A I think Nick Fuentes was there, but -- and I remember there was -- no, I think  
14 Nick spoke out on the side. There was a microphone set up out on the side. I think  
15 that's where he spoke.

16 But, yeah, I don't remember specifically anybody being over there. I just -- we  
17 were just keeping an eye on the counterprotesters, making sure they weren't going to run  
18 in and start attacking people, so --

19 [REDACTED]. Okay. [REDACTED], do you have some questions?

20

BY [REDACTED]

21 Q Yeah, thanks.

22 You mentioned Nick Fuentes. What do you know about Nick Fuentes?

23 A Just that he's a political pundit, I guess is the way to put it.

24 Q Got it. Do you see him a lot at events that the Proud Boys are at?

25 A I had never seen him before in person, and I never saw him again in person

1 after that.

2 Q So how did you recognize him on November 18th?

3 A I had saw his video. I've seen videos of him.

4 Q Got it. Do you follow him?

5 A No, I haven't.

6 Q Did -- I'm sorry. Then where did you see his videos?

7 A I mean, I've seen his videos, but I'm not a follower. So when you say I'm a  
8 follower of him, I don't --

9 Q Well, I meant do you follow him on his livestream show or on social media?

10 A No, I've just seen clips.

11 Q Got it. So are you familiar with the kind of political analysis that he does?

12 A Right wing.

13 Q Yeah.

14 A Conservative. That's -- I'd say that's probably -- what I gather from. I  
15 wouldn't suspect he was anything different if he was at that rally that day.

16 Q Got it. Are you familiar with the kind of widespread characterization of  
17 Nick Fuentes as a White supremacist?

18 A I'm familiar with -- I've heard that, yeah, but I've heard that about a lot of  
19 people. I've heard that about a lot of people, so I don't -- I haven't been putting a lot of  
20 stock in it lately.

21 Q Got it. So when people call conservatives White supremacists, that doesn't  
22 mean anything to you?

23 A No, not -- not to me, no.

24 Q Got it. And what do you remember Nick Fuentes doing in Atlanta?

25 A [REDACTED], I believe I'd said that he was speaking on the outside. I think

1 that's what I remember of him, yes.

2 Q Got it. Did any Proud Boys interact with Mr. Fuentes?

3 A Not that I saw.

4 Q Okay. So you just saw him speaking, potentially going inside the capitol?

5 A I don't know if he went inside the capitol. I just know he was outside  
6 speaking.

7 Q Okay. All right. Thank you.

8 A Uh-huh.

9 BY [REDACTED]:

10 Q I'm curious if there were any individuals that -- and we can kind of broaden it  
11 to November 14th and 18th and December 12th and even the 6th -- but we talked about  
12 the wide -- the kind of impression that Mr. Fuentes is a White supremacist. I think you  
13 maybe disagree with that or at least don't put much stock in it.

14 Is there anybody that travels in these groups, these speakers, people that you see  
15 at these events that you do consider a White supremacist?

16 A If they were, I wouldn't associate with them. I mean, that I -- you know --

17 Q Yeah, and not to say that you associate with them, but are there people that  
18 you know of as -- that you believe, based on facts that you've observed, are White  
19 supremacists?

20 A People that go, like, and speak at the rallies?

21 Q Yeah, I'm just thinking of any prominent individuals that --

22 A I mean, I don't know what's in another man's heart, so I can't really say.  
23 But, I mean, no, I don't -- again, I don't judge what I think they are. I just -- I listen to  
24 words and listen for facts and truth, and that's about it, so --

25 Q And that's totally what I mean. I'm really just asking kind of your

1 impression, having listened to some of these people's words and divining those facts and  
2 truths for yourself, have you come to the conclusion that anybody you've seen at these  
3 rallies is a White supremacist?

4 A No. I mean, if you're talking on David Duke level, no, I would say no way.

5 Q Okay. You mentioned that you all grabbed a meal, it was -- I think it was  
6 dinner, you maybe said, in the evening with Mr. Jones at a Hooters.

7 A Yes.

8 Q How did that come about? Was that arranged through Mr. Tarrio again?

9 A Yes.

10 Q Okay. And just tell me about that, how did you get to that --

11 A I think after we were at the capitol we went and checked into a hotel. And  
12 Enrique's car got stolen outside the hotel. And so we spent a little time looking for the  
13 car, talking to the cops when they got there.

14 And then he was in a room across the way from me. And we were just kind of  
15 talking through the door. He said, hey, we're going to go meet up with AJ over at  
16 Hooters in downtown. It's about 10 minutes from here. I was like, okay.

17 So we went out that evening and had a couple cheeseburgers and some wings and  
18 a couple of drinks, and that's really all there was.

19 Q Okay. A couple of questions.

20 So now at November 14th Mr. Tarrio had arranged security for Mr. Jones and then  
21 in November 18th it was clued in by Mr. Jones about this meal.

22 What's your assessment at this time of their relationship? Do you know? I  
23 mean, are they talking frequently? Are they -- I'll start there.

24 A If anything, he made it seem like he did, but I don't know. I don't know if  
25 he even spoke directly to Alex Jones about it or if he went through a third party. I don't



1 know. I have no idea how often they spoke.

2 Q We've always -- we've been talking about Mr. Jones. But do you know  
3 Mr. Owen Shroyer?

4 A Yeah.

5 Q Okay. And was he present for any of these events that we've talked about  
6 so far?

7 A Yeah, I believe -- I don't know if he was in Atlanta. I didn't see him in  
8 Atlanta. I did see him, I want to say, the weekend of the 12th, like the Friday night  
9 before the big rally. I think I saw him at -- across from his hotel where they all kind of  
10 used to meet up with their megaphone and throw beers into the crowd and stuff like  
11 that, so --

12 Q And then did you say, for the 14th, was he with Mr. Jones when you were  
13 doing security?

14 A I don't believe so.

15 Q Okay. Have you met Mr. Shroyer?

16 A In person, like introduced, no.

17 Q Yeah, okay. And then how about Oath Keepers at the rally on  
18 November 18th, did you see any Oath Keepers?

19 A Not that -- no. No, sir, not that I can recall, no.

20 Q And didn't -- don't recall any conversations with either Mr. Tarrío or other  
21 Proud Boys about Oath Keepers being there?

22 A No, sir.

23 Q And then you mentioned that Mr. Tarrío's car was stolen at the  
24 November 18th rally?

25 A Yes.

1 Q Was that ever recovered?

2 A Yes.

3 Q Okay. And what happened --

4 A It was his mother's car, I believe.

5 Q His mother's car?

6 A Yeah, it was his mother's car.

7 Q Okay. And what happened there?

8 A He was a dummy and left his car running and took the key into him with the  
9 hotel to go check in. It was a Mercedes with the push start. So he had the key, went  
10 inside to check in, and just as he was coming back out somebody with the car running, I  
11 guess, and jumped in it and took off and stole it.

12 I was in the back -- yeah, I was in the back parking garage, or I had to whip around  
13 to come back to get into the parking garage and they called me. And I kind of drove out  
14 there and tried to go out and look for the car, but it was gone.

15 Q I don't think my mom would be very happy if I lost her Mercedes.

16 A No, I don't think so. I don't think my mom would either.

17 Q Okay. Any other questions from anybody else about November 18th?

18 I guess I'll ask you, Mr. Bertino, anything notable about November 18th that we  
19 haven't discussed?

20 A No. It was pretty unremarkable, to be honest with you.

21 Q I take it, since you had a smaller Proud Boy presence, that you weren't doing  
22 the sort of marching that you did on November 14th and December 12th?

23 A I mean, they circled -- the whole group kind of circled the capitol a couple  
24 times, just kind of marched around the capitol on the outskirts.

25 And like I said, there was a small group of counterprotesters, which I actually went

1 up and -- yeah, that's one notable thing. I went up and the one guy that was kind of  
2 giving me mean mugs, I went up to him and pulled him aside and said, hey, let's go have a  
3 chat, let's go have a conversation.

4 And so him and I actually -- he looked like he was kind of in charge of everything,  
5 and him and I actually kind of had a talk. And I was like -- we actually had a very  
6 reasonable discussion, and it was like, look, if you keep control of your people, we'll keep  
7 control of our people. We'll make sure that there's no fights, no violence, everybody  
8 gets to say what they want to say.

9 And so it was actually a really good conversation I had with an antifa member  
10 down there, so -- yeah, black bloc or whatever he claimed to be that day, I don't know.

11 But yeah, so that was -- that's one notable thing that was really good about that  
12 day. But other than that, no, nothing else.

13 Q Okay. How about any, like, violent interactions between Proud Boys and  
14 counterprotesters?

15 A That day, no. I don't know if there was anything the next day because I  
16 wasn't there, but --

17 Q Okay. All right. Let's move on to talk about December 12th. And then  
18 just to let you know my plan, I was going to get through December 12th, which I don't  
19 think will take terribly long, and then we can take a break for lunch. Is that all right?  
20 Or we could, alternatively, I'm fine if you'd prefer to take a break now.

21 Mr. Wellborn. Well, I think we were talking about 1:30 for lunch, so we're --

22 [REDACTED] Yeah, that's fine. Do you want to do --

23 Mr. Wellborn. It's 1:20.

24 [REDACTED] Why don't we -- sorry, say that again.

25 Mr. Wellborn. We're at 1:20 now.

1           [REDACTED] Yeah. So, okay, why don't we do -- let's take a break -- hold on one  
2 second -- till -- it's 1:22. Let's come back at 2 o'clock.

3           Mr. Wellborn. Sounds good.

4           [REDACTED] Okay. Great. Then we're off the record at 1:22.

5       [Recess.]

1

2 [2:02 p.m.]

3 [REDACTED] Then we're back on the record at 2:02. And I think we had basically  
4 just finished talking about November 18th. Did anybody have any -- or, [REDACTED], did  
5 you have any questions about November 18th?

6 [REDACTED] No, thanks.

7

BY [REDACTED]

8 Q Okay. Oh, one other question on the 18th. Mr. Bertino, had you  
9 met -- did you meet Ali Alexander in Georgia on the 18th?

10 A Yes. Meet? Let's define "meet." I saw him there. I didn't introduce  
11 myself, shake my hand, or any of that. I just saw him there. We happened to be in the  
12 same vicinity.

13 Q Okay. And what was that vicinity or what was the area?

14 A Outside the Capitol.

15 Q For -- on the 18th, do you recall a meeting in a hotel lobby, like, where  
16 people were having cocktails or like a social gathering in a hotel lobby?

17 A I do not.

18 Q And then what was Mr. Alexander doing when you saw him outside the  
19 Capitol?

20 A I think he was speaking on the steps.

21 Q Okay. And then just kind of close-out question. Anything notable about  
22 the 18th that we haven't discussed?

23 A No. Like I said, it was a pretty calm atmosphere. I -- the only thing bad  
24 that happened was the car theft, so --

25 Q Sorry. I believe I asked this, but just to make sure. Did you say you did

1 not see any Oath Keepers there on the 18th or you weren't aware of any?

2 A I don't know. There may have been some there; not that I was aware of,  
3 no.

4 Q Okay. Between the November 18th rally and December 12th, did you  
5 attend any other rallies with the Proud Boys?

6 A I don't know the timeline. I'll be honest with you; I don't know if it was  
7 between then or not. I don't remember.

8 Q Okay. Other than November 14th, November 18th, and then we're about  
9 to talk about December 12th, were there any major or kind of, like, big events that you  
10 did with Proud Boys that are standing out in your mind in the November/December  
11 timeframe? So like post-election, pre-January 6th?

12 A Could have been one in Raleigh, but I don't know when the date of that was.  
13 I don't know when that fell. That -- I think the one in Raleigh might have been early  
14 November. So, yeah, I don't think it was between the 14th and the 12th.

15 Q Okay.

16 A It wasn't a huge event by any means.

17 Q Was -- you mentioned the second amendment event. Is that the one that  
18 you're talking about?

19 A No. There was one at the Governor's mansion in Raleigh, North Carolina.  
20 So it was a local one, a small one.

21 Q Okay. Got it. All right. So let's talk about December 12th then. We'll  
22 start with just kind of logistics, again. How did you travel there, and where did you stay?

23 A I drove by myself, and I stayed at the same hotel, the Phoenix.

24 Q The Phoenix. Okay. And this time at the Phoenix, do you recall any other  
25 particular Proud Boys that stayed there with you?

1           A    A lot of people stayed there.

2           Q    Okay.

3           A    I would say probably 50 percent of the hotel capacity was probably Proud  
4 Boys that day, and the rest were all, how we say, normies and boomers.

5           Q    Okay.   How about Latinos for Trump?

6           A    I believe so, yes.   If I remember correctly, there was definitely Latinos for  
7 Trump shirts and stuff and hats and stuff like that around there, so yeah.

8           Q    And for the 12th, did you hear of any organization or coordination between  
9 Mr. Tarrio and Ms. Gracia or that -- or the organization itself, Latinos for Trump?

10          A    I think that -- I don't know if that was the time when -- I think Latinos for  
11 Trump got invited to the White House maybe.   You'd probably know better than I  
12 would.   I can't remember the date, but I think that morning they were supposed to go  
13 take a tour of the White House, and that's all I knew.

14          Q    Right.

15          A    I don't know if it happened.

16          Q    Yeah.   Did you hear from Mr. Tarrio about that White House tour at all?

17          A    No, I did not.   By the time he got to Harry's that morning, there was already  
18 so much going on, trying to keep everyone together, that I didn't have a chance to talk to  
19 him about it.

20          Q    Okay.   But you did -- you were aware that he had gone to the White  
21 House?

22          A    Now I am, yeah.   Yeah.   After the fact I was, yeah.

23          Q    Okay.   Had you heard anything about it at the time?

24          A    That I can recall, no.   I don't recall hearing anything because, like I said,  
25 there was too much other stuff to focus on when he got back.   So he may have briefly

1 mentioned it, but, you know, like I said, there was just so much going on that I couldn't -- I  
2 couldn't be specific to remember when he told me or if he told me that he went.

3 Q Got it. Have you talked to him about the White House tour since then?

4 A I don't think it was ever really a topic of conversation that I had with him  
5 that I can remember. I know he took a picture maybe outside of it, and that was it. I  
6 think there was some timing issue, I think I remember him mentioning, but I didn't get  
7 into specifics about what he did. I think I might've asked if he got to meet Trump, and  
8 he said no. That was about it.

9 Q What sort of -- do you remember any details about this timing issue?

10 A Well, no, because he was -- he was not supposed to make it back to our  
11 meet-up point because he was supposed to be on that tour of the White House during  
12 our meet-up time, but somehow they went in earlier, and he ended up making it to the  
13 Harry.

14 Q And Harry's was the meet-up point that morning?

15 A Yes, sir.

16 Q Did you provide any personal security or event security for the 12th that you  
17 recall?

18 A No, I don't think so. Me personally you mean or the organization?

19 Q Yeah. We'll start with you, and then I was going to ask if you heard of any  
20 other Proud Boys doing that.

21 A No. I pretty much just kind of stuck to Enrique and, you know, better make  
22 sure that nobody came up and shanked him in the neck or something. That was pretty  
23 much it.

24 Q Was there anything different about December 12th as compared to  
25 November 14th, or was it just kind of the same show up in D.C., march with the Proud



1 Boys, and attend the "stop the steal" events?

2 A Yeah. I felt like the energy in the air was different, I guess.

3 Q Okay. And how was it different?

4 A I don't know. I guess I felt like -- I kind of had a premonition that  
5 something was going to happen to me that day. The whole day I just had a feeling that  
6 something was going to happen to me and so, yeah. I guess the feeling for me was a  
7 little bit different.

8 Q Okay. Were -- and anything that was more of just like a personal thing,  
9 personal premonition as opposed to the atmosphere of the crowd or the circumstances  
10 surrounding the event being different?

11 A Yeah. I think, unfortunately, there was a lot of the newer guys that showed  
12 up on the 12th who didn't understand kind of the finer points of how to conduct  
13 themselves in public and some of those guys were running all over the place and, you  
14 know. There was -- I mean, it wasn't just the Proud Boys. Even the normies were just  
15 running off at the first sign of trouble and looking -- looking for, you know -- I guess  
16 looking to be offensive in defense.

17 So, like, if they saw somebody walking up that they didn't recognize or that looked  
18 shady, they would run over to him, be, like: Hey, what are you doing? That sort of  
19 thing. So, I guess, it just seemed like a different atmosphere than November 14th.

20 November 14th was more fun-loving. It was just -- you know, a lot of people just  
21 getting together and loving each other. December 12th was the same thing in the  
22 morning, but it just seemed different for some reason. I guess -- you know, maybe it's  
23 just my feelings on it because it was different for me that I can go back and think of, but,  
24 you know. It just felt a little different.

25 Q Okay. But your impression generally was that the newer members of the

1 Proud Boys who maybe were not abiding by what you thought were the established  
2 norms or rules of Proud Boys were being more aggressive on the 12th?

3 A Yeah. Yes. Absolutely. They were running off and getting into fights  
4 and stuff like that and not listening, trying to go to, like, the Black Lives Matter Plaza  
5 during the day to go start fights with them, you know. And I did my best to recall  
6 everybody. Like: No, we're not doing that. Stop. That's not what we're here for.

7 Unfortunately, you know, you can't stop -- sometimes when there's a group of 900  
8 to a thousand men, no matter what position anybody holds, you can't stop them.  
9 They're going to do whatever they're going to do.

10 Q That was actually going to be my next question. Just comparing the  
11 presence -- the Proud Boy presence on November 14th and December 12th, I think you  
12 said 175 to 200 Proud Boys on November 14th, recognizing that's a ballpark number --

13 A Yeah.

14 Q What, by comparison, or do you have a guess at what the number was for  
15 December 12th?

16 A Hard to guess that much. I mean, there was -- if I had to take a wild guess,  
17 700 plus probably another thousand to 1,500 just regular people there, normies. So --

18 Q Okay. So more than double the Proud Boy presence on the 12th as  
19 compared to the 14th?

20 A I would say, yeah.

21 Q Okay.

22 A We anticipated probably a thousand people being there, thousand guys.  
23 And it might have been a thousand. I just -- you just can't count that many people. It's  
24 like -- it's herding cats in the first place, you know. You can't herd a cat. You can't herd  
25 cats, and that's what it was like. We couldn't get an accurate count, to be honest with

1       you.

2               Q     Yeah. I have sort of some of the same questions that I asked for the  
3       November 14th rally. Did you ever hear Mr. Tarrio talking about coordinating with any  
4       organizers of the rally, making any plans with them?

5               A     For December 12th?

6               Q     Yeah.

7               A     The only thing that I remember was they wanted him to speak at Freedom  
8       Plaza on December 12th. So we got him up to the stage, and then the organizer  
9       changed their mind and he wasn't going to speak, and that was the only thing that I can  
10      remember like him ever saying that he had any, you know, anything going on as far as  
11      talking to any of the organizers. I don't remember. There was so much going on that  
12      day.

13              Q     Do you remember who it was that initially told him he could speak and then  
14      told him he couldn't?

15              A     I have no idea, honestly.

16              Q     Okay. I'm going to show you a couple documents. And these are some  
17      communications between folks that were rally organizers involved in planning the  
18      November -- or, sorry, December 12th event, and the first one I'd like to pull up -- do we  
19      still have -- [REDACTED], can we pull up exhibit 37? Awesome. Thanks. And let's zoom  
20      in so we can see that top half. Yeah. That's great. Right there.

21              So this is -- this is a group text among a couple different individuals -- Kylie Kremer  
22      we talked about earlier. She's one of the leaders of Women for America First, which  
23      was a primary organizer of the November and December rallies, and then also individuals  
24      that work with that group, Dustin Stockton and Charles Bowman. I think I asked you  
25      about Charles Bowman earlier. That name doesn't ring a bell to you?

1           A    No, sir.

2           Q    And then how about Dustin Stockton; does that name ring a bell?

3           A    No, sir.

4           Q    Okay. Well, I just show this to you and I'll point out -- so there's the text  
5   December 12th, at 2 p.m., and this Charles Bowman, who is involved with planning  
6   security for Women for America First and the rally, says: Three-fourths of Proud Boys  
7   are at monument now.

8           Then he says: So, if antifa is going to come in and try to break the box, it will be  
9   now. We are good so far, though. We can pull this exhibit down. It's just those  
10   couple texts.

11          So what I want to ask you is, does that terminology mean anything to you, "break  
12   the box"?

13          A    I've never heard it used before. I mean, I can only assume what I would  
14   think it would mean.

15          Q    Okay. Was there -- were you aware of or was there a general plan for  
16   Proud Boys to create like a perimeter or a box and protect a certain area?

17          A    Not -- no, no. That was never -- never in any of the planning chats that I  
18   saw, no.

19          Q    Okay. As far as you were aware or from what you recall, what was the plan  
20   for the day of on December 12th?

21          A    Well, again, this goes back to Enrique playing everything close to the chest.  
22   There was a huge planning chat with a bunch of people, and they were planning to -- we  
23   had enough guys that we were hoping we could just line the edge of whatever route that  
24   they were marching, just try to line guys every, you know, 25 yards or so along the whole  
25   crowd so that you could come together and act as a barrier if anybody tried to attack the

1 sides, because that's usually what would happen, is if you get like some stragglers, you  
2 know, and they would be on the side, if they were going to come start trouble, they  
3 would wait until there wasn't a lot of people, and then they would rush in and start  
4 trouble there and then run back out.

5 So the idea that we had composed was to everyone just to stay in lines on either  
6 side of the crowd as they marched to act as a wall, a barrier.

7 Well, probably 2 days before the rally and guys spent so much time trying to  
8 organize all that and make sure that, you know, we had a good security plan, about 2 days  
9 before, Enrique just kind of came into the chat and said: No, we're not doing that.  
10 We're just going to meet here, and we'll go.

11 So that was kind of how he operated with that stuff, so yeah. That's -- that's  
12 really the only plan that we had was to just try to be a barrier between the normies and  
13 black bloc or antifa whenever they would come in and try to attack.

14 Q So you said there was the planning chat, was that just Proud Boys on that  
15 planning chat?

16 A Yes.

17 Q And --

18 A Let me rephrase that: That I knew of, again, because I don't know -- on  
19 Telegram, it's impossible to know who you're talking to.

20 Q Right. Sometimes, I guess, just to distinguish sometimes, you know, we've  
21 seen some of these sorts of planning chats where it's a bunch of different groups coming  
22 together and everybody says: Hey, so-and-so's from this group, so-and-so's from this  
23 group. But it sounds like that was not what this chat was like?

24 A I don't think I could ever recall being involved in any chat like that that was  
25 mixed company with different people like that, not for planning a rally at all.

1           Q    So I recognize it's not a box or a perimeter, but it does sound like you had a  
2   general plan to create some sort of barrier or act as, you know, protection and a divider  
3   between people who were attending the rally, normies, and antifa or counterprotesters.  
4   That's accurate?

5           A    Yeah. We didn't have it, though. Again, it never materialized, and there  
6   was never -- there was never walls on either side. I don't know what they mean by  
7   "break the box." I mean, I don't think that was attributed to what our plan was that day  
8   because, again, our plan got tossed in the trash can. So -- and that was just one of the  
9   multiple ideas that they had to try to keep everyone safe was the lining up on the sides,  
10   but -- because it works in smaller rallies. We just don't think it would've worked at that  
11   big of a rally.

12           But, yeah, the box thing, breaking the box, I guess -- I don't know what that  
13   means. Like I said, I can make assumptions and I could make judgments on what I think  
14   it means, but it's nothing that I have direct knowledge on.

15           Q    Can you give me a little bit more detail about this change in plans that it  
16   sounds like Tarrío decided on? So there was going to be this lining up along the route,  
17   and then 2 days in advance, Mr. Tarrío kind of scrapped those plans. Is that right?

18           A    Well, that was just one of the ideas that was being talked about in the  
19   planning chat. That was just one of them. One of the other ones was going to  
20   be -- some of the other guys wanted to just put out groups of, you know, 50 to, you  
21   know -- 50 to 60 guys and have them march in intermittent spots throughout the, you  
22   know, I guess the parade, you would call it, of people as they were marching, kind of  
23   spread them out randomly so that, you know, they could cover more ground and be a  
24   little bit more of a force to deal with if there was, you know, 150 people rushed in to try  
25   to attack the crowd.

1 But that was just one of the ideas that was being -- that was talked about. And  
2 so, like I said, I don't remember ever there being a solid plan when Enrique finally, you  
3 know, came in and said: Oh, that's not what we're doing. Everything just got shot so --

4 Q Do you know why he did that, or did he ever talk to you about it?

5 A Nope. He just said: That's stupid. We're not doing that. Just  
6 everybody meet at Harry's, and we're going to go here.

7 That was it.

8 Q Gotcha. It sounds like there was a little bit more or maybe I'm wrong, just  
9 tell me, a little bit more planning or some idea that there was going to be a more  
10 organized presence on the 12th than on the 14th. Is that right?

11 A Yeah, yeah. Because when you get -- you know, when you're starting to  
12 expect so many more people, you got to kind of have a plan to try and keep these  
13 people -- you know, keep people safe, keep people from running off and doing things  
14 they're not supposed to do, breaking the law, getting hurt, getting stabbed, et cetera.

15 So you got -- when you're dealing with large groups of people like that, you know,  
16 you just don't -- you don't just turn them loose and say: Go ham, go do whatever you  
17 want to do. It doesn't work, especially when they're representing an organization, and  
18 they're out there representing an organization, you can't just have people just running  
19 loose, going crazy.

20 Q We haven't really talked specifically about kind of communications among  
21 Proud Boys. So I'd like to kind of take a detour for a second. Were all this planning  
22 you're talking about was that going on on Telegram?

23 A Yes, sir.

24 Q Okay. And is Telegram basically the primary or only app that you use to  
25 communicate with Proud Boys?

1           A    Yeah, that's the majority of where all communications were done was on  
2 Telegram, yes.

3           Q    Okay. And then I know -- so you said there was this December 12th chat  
4 we'll talk about in a second, some of the MOSD chats, and the chats around January 6th,  
5 but I just want to understand what's happened to those chats or your understanding of  
6 what happened to them. I take it you don't have access to those anymore?

7           A    No. I -- couple months back, I kind of had -- had an agreement with my  
8 better half, and I was like: I'm getting rid of Telegram. I'm getting rid of it. I'm done  
9 with this organization. I'm not going to be part of it.

10           And so part of that was kind of dissolving that account. Plus, you know, I had a  
11 lot of female followers on there, and that didn't make things easy either. So easiest way  
12 to do it was just to just delete the old Telegram account. So I completely deleted the  
13 account, took the app off my phone, and then -- yeah.

14           So everything that would have been associated with that old account was deleted.  
15 That's why I can't recover it. I did attempt, but I couldn't recover anything.

16           Q    Got it. Understood. Okay. So when you -- so different than like nuking  
17 a chat or deleting chats, you fully deleted your --

18           A    Account.

19           Q    -- account?

20           A    Yes.

21           Q    Got it. Okay.

22           Mr. Wellborn. Can we pause for one second? I'll be right back with you.

23           [REDACTED] Yep.

24           Mr. Wellborn. This is not related to your line of questioning; this is related to  
25 we're about to get whacked by a thunderstorm.



1 [REDACTED] Okay. Sure.

2 [Recess.]

3 BY [REDACTED]

4 Q So we were just talking about deleting the Telegram account. Any other  
5 applications that you commonly used to communicate with Proud Boys?

6 A Besides a phone call or text messages, not really. Signal once in a while,  
7 but Signal never really took off. Nobody really used it.

8 Q Okay. And then, as for text messages, had you gone back to look and see if  
9 you have text messages with other Proud Boys from around the time?

10 A I don't have access to that phone anymore.

11 Q Okay.

12 A Yeah. So I don't have it, so I can't -- I couldn't produce it because I don't  
13 have it.

14 Q Right. Okay. I wanted to ask you about another individual that I had  
15 believed was there on the 12th, and that's Mr. Qusted (ph), Nick Qusted (ph). Do you  
16 know who that is?

17 A I do not.

18 Q A British documentarian that might have been following you guys around on  
19 that day?

20 A On December 12th?

21 Q Uh-huh. Yep, on the 12th.

22 A That I personally interacted with, I couldn't tell you. I think there was a guy  
23 on the 14th that was British and interviewed a couple of us, but I don't remember him  
24 being there on the 12th. But, again, the 12th was a madhouse. So he could have been  
25 standing on my right the whole time and I wouldn't have known.

1           Q    He actually says that he was present for your stabbing and administered first  
2   aid to you after that happened.

3           A    Really?

4           Q    Yeah.   So maybe -- so maybe you don't recall that?

5           A    No, I definitely don't recall that.   Like I said, that -- pretty much anything  
6   from that morning on is little flashes that I can remember, but if he administered first aid  
7   and you've got his phone number, I'd like to thank him.

8           Q    Okay.   Let's see.   Okay.   So then I wanted to show you just one other  
9   document -- hold on one second.   Well, actually, one other question.   So on the topic  
10   of kind of documentarians or photographers.   We haven't talked about Amy Harris.   Do  
11   you know Amy Harris?

12          A    Yep.

13          Q    Okay.   When did you first meet Amy?

14          A    I think it was November 3rd on election night maybe.   If it wasn't election  
15   night, it would have been November 14th that I can remember actually meeting her.

16          Q    And was she already -- was she there kind of paired up with Mr. Tarrio at  
17   that point already, or how did you meet her?   Just give me some context.

18          A    I think -- I think that -- that was either on the 12th or the 14th that she was  
19   paired up and, like, walking around and taking pictures of him all the time and kind of  
20   being there, you know, documenting what she was documenting.   I don't -- I think that  
21   would have been -- that might have been the 14th, I don't think that was the third, but  
22   then again I could be wrong.   My memory's hazy from, you know, that long ago.

23          Q    What's -- can you describe Ms. Harris' relationship to Mr. Tarrio and then  
24   also kind of to the Proud Boys at large?

25          A    From what I understood, she was -- I talked to Amy directly many times

1 about this is, she was trying to do a documentary on the club that she eventually wanted  
2 to bring to the networks and sell. So that's why she was out always there with him and  
3 always kind of following us around. She was doing a documentary that she hoped to sell  
4 one day. And so that's what I knew. And she kind of happened to, you know -- she ran  
5 interference for Enrique between his women on multiple occasions, just, you know,  
6 seemed like a friend, even though she didn't agree with a lot of the stuff that we, you  
7 know, said or whatever. She just seemed like a friend and somebody that wanted -- I  
8 think she was in it to make a documentary about -- about Enrique and about the  
9 organization.

10 Q You mentioned that she kind of ran interference between Enrique and his  
11 girlfriends. Was there a romantic relationship between Ms. Harris and Mr. Tarrio?

12 A I doubt it. I doubt it. I never picked up on any of that.

13 Q And then, had you -- did you have any other interactions with her other  
14 than -- I know you can't recall if it was the November 14th or exactly what day it was that  
15 you had met her first, but other than those major events at the big rallies, did you have  
16 any other interactions with her?

17 A Spoke to her on the phone a few times, yeah.

18 Q Okay. What would you speak about when you talked to her?

19 A She generally would call me, like, to do, like, an interview with, you know,  
20 another -- another filmmaker, something like that that wanted to interview. When  
21 Enrique got arrested on the 4th, she helped coordinate getting him out or figuring out  
22 what jail he went to. She was kind of right in the mix of all of that. So she was kind of  
23 helping everybody figure out where he was.

24 Yeah, I think it was just -- I think it was just random texts here and there. You  
25 know, nothing -- nothing major, just friendly stuff, or if there was an article or a: Hey,

1     you know, I'm going to be at this place doing this, you know; are you guys going. Stuff  
2     like that. Just trying to -- I think just trying to further her documentary, really.

3             Q     Yeah. So it was actually through Amy Harris I think that Mr. Quested (ph),  
4     the one that I mentioned earlier, kind of came in contact with Proud Boys and Mr. Tarrio?

5             A     Oh, okay.

6             Q     So he might have been one of the individuals that Ms. Harris was trying to  
7     set you up with at some point?

8             A     It may actually have been him. I'm not entirely sure, but it may have been.

9             Q     Thinking about kind of Ms. Harris' interactions with Mr. Tarrio and any other  
10    Proud Boys, but I think, in particular, Mr. Tarrio, I guess I'll ask this question, in, you know,  
11    I think there are certain kind of standards in the journalistic and documentarian world  
12    about maintaining some sort of distance from your subjects, some sort of detachment,  
13    and being sort of unobjective observer as opposed to involved in the actions or what your  
14    subject's doing.

15            Did you get any sense that the relationship was a little closer between Mr. Tarrio  
16    and Ms. Harris than maybe a traditional documentarian versus subject, particularly like  
17    when you mentioned things like her running interference for his girlfriends or --

18            A     Yes, sir. I think -- I think -- you know, this is just my opinion, but I think she  
19    genuinely liked -- they liked each other as who they were. Not romantically, but they  
20    were friends. But, again, I think her ultimate goal -- because with Enrique, it was kind of  
21    like you got to play a certain game with him. You got to stroke his ego a little bit, and I  
22    think that's mainly what she was doing was stroking his ego to get the story.

23            Q     Uh-huh. Okay. So I know you mentioned, like, on January 4th when Mr.  
24    Tarrio was being released from -- or I guess it was the 5th?

25            A     Yeah, the 5th I think he got out.

1           Q    When he was being released that she helped coordinate some of that or  
2   figure out where he was getting released from.   Any other instances that you can think  
3   of where Ms. Harris assisted Mr. Tarrio in any way kind of like that, either in planning for  
4   an event or putting him in contact with other people?

5           A    She put him in contact with somebody to do an interview.   She also -- but I  
6   think that was the same person that she wanted me to do the interview with and then  
7   eventually told us not to because they were -- I don't know what happened between  
8   them, but either way, none of my business.

9           But, again, just -- not that I can think of off the top of my head that I witnessed.  
10   Doesn't mean it didn't happen or did happen, but not that I witnessed that I can think of  
11   that would be relevant, no.


12          Q    Okay.   Okay.   I wanted to pull up another exhibit.   Let's pull up  
13   exhibit 39.   So this is another group chat, couple of the same or similar individuals,  
14   people associated with Women for America First, and this is a group chat about security  
15   for the December 12th event.   I had mentioned the Chafians to you earlier, Scott and  
16   Cindy Chafian.   I don't think you're going to know any of the folks on this chat, but not  
17   going to be too relevant to what I'm going to ask you.

18          So if we can scroll to page 16, and then it's that -- the two messages towards the  
19   bottom -- I think we lost that one.   There you go.   Yep.   I'll give you a second to read  
20   through those, and just let me know when you've had a chance to get through that.

21          A    So I'm reading where Scott says?

22          Q    Yeah.   It starts with "hey, Scott" from Rob Lewis 1A Group?

23          A    Okay.   Okay.   Read it.

24          Q    And then there's one more message on the next page that I'd like you to  
25   read, just that top one.   You can scroll up, , it's just the very top.   Just the

1 message that says: I don't think Ali or AJ will be there. Felisa has direct comms with  
2 PB founder Enrique.

3 So couple questions. You can scroll up to those bigger messages so that Mr.  
4 Bertino can look at those if he needs to.

5 Couple questions. So those two kind of more substantive messages are from a  
6 man named Robert Lewis. Does that name ring a bell?

7 A No, sir.

8 Q Okay.

9 A Is this on Telegram?

10 Q I think these -- I'm actually not sure which app. I think these are through  
11 Telegram.

12 A Because this way I could figure out if I recognized a Telegram handle or  
13 something, but these are just regular names, so --

14 Q Yeah. I'm not actually sure what app this was done on, but -- okay. So  
15 that doesn't ring a bell.

16 A No, sir.

17 Q The second message about Alicia or Alicia having direct contact with Mr.  
18 Tarrio, do you know anybody by the name of Alicia --

19 A I think it was Felisa.

20 Mr. Wellborn. I think it was spelled with an F.

21 [REDACTED] I'm sorry. Felisa, yeah.

22 The Witness. No, not that I'm aware of. I'll just put it this way: He knows  
23 plenty of women. So I have no doubts that he may have known her, but I don't know  
24 how. And I don't think I ever met anybody by that name, so I can't comment.

25 BY [REDACTED]

1 Q All right. And then -- you can just take that exhibit down, [REDACTED]. That's  
2 fine.

3 Okay. And then -- so just taking you back to the day -- actually, the day before  
4 December 12th, there was a speech that Roger Stone made in the evening of  
5 December 11th on the steps of the JW Marriott, which is one of those hotels that's near  
6 Freedom Plaza.

7 A Uh-huh.

8 Q Do you recall that at all?

9 A Is it the 12th or the 11th?

10 Q It was on the evening of the 11th.

11 A I don't think so.

12 Q When did you get into D.C.?

13 A Got in the 11th. And I was out that night, the 11th, but I don't -- I don't  
14 know if I remember it.

15 Q Do you recall who you were with the night of the 11th?

16 A For the most part I was with Enrique. I think I broke off and went to the  
17 hotel early, but, again, I don't remember, so I don't want to say one way or another  
18 because I really do not remember.

19 Q Okay. We can -- actually, during a break, I can pull up a video of it and try  
20 to refresh your recollection, but Mr. Stone on the steps of the JW Marriott and both Mr.  
21 Tarrio and Rufio, Ethan Nordean, were standing next to him during the speech, and there  
22 was kind of a largish, maybe 100, 200 people impromptu crowd just on the street outside  
23 of the JW, but it sounds like that is not ringing any bells for you?

24 A That whole weekend was a huge blur; I'll be honest with you. So I very well  
25 could have been there and don't remember, to be honest with you.

1           Q    Let's then start maybe from when you arrived in D.C. and then just kind of  
2 walk through the 11th and then the 12th, and then I'll stop you in a couple places to ask  
3 some questions.

4           A    The 11th, one of the things that sticks out is I remember telling  
5 everybody -- Enrique telling everybody: No colors. Don't wear your colors on Friday.

6                Because he knew there was going to be a lot of people there, and if they were  
7 staying at hotels outside of the Harrington, didn't want to draw attention to those hotels  
8 like the Phoenix.

9                So I remember him saying: Don't wear your colors. You're going to draw  
10 attention to the thing, and we don't want people coming trying to burn down the hotels,  
11 and be a lot of people there, and you just never know.

12               So that stuck out. And so Friday night I remember everybody being at the bar at  
13 the Phoenix, lot of people being there at that bar in the Phoenix restaurant, and -- which I  
14 can't remember the name of it. And, Friday night, we did a little march around the city,  
15 pretty much uneventful if I remember correctly, nothing really big happened. We kind  
16 of just walked around. Went back. Saturday morning -- went back to the hotel.

17               Then Saturday morning, woke up, everybody got dressed, and we headed down to  
18 Harry's, where we met up again at Harry's.

19           Q    Okay.

20           A    Did some interviews down there, Gavin McInnes' reporters were there. So  
21 did some interviews down there, had some fun. We were just having a really good time  
22 in the morning. And --

23           Q    Just because it sounds like it stands out in your memory as a particularly  
24 good time, what was going on that made it so fun?

25           A    That morning was just a lot of clowning, a lot of joking. The guys were



1     there wearing kilts with no underwear under them, and, you know, just -- I mean,  
2     just -- just out there clowning around, and that was about the only good time I think I can  
3     remember we had, that I personally had that week -- that weekend, but yeah.

4             I remember just clowning around, everybody being kind of happy-go-lucky. I still  
5     had that sinking feeling that something wasn't right, but, again, it's one of those things  
6     where I try to fight it off and just push through it and have a good time.

7             So we did that. Everybody kind of met up, and then we all -- that morning I don't  
8     even remember -- I think if I remember correctly, we went to Freedom Plaza. Yes.  
9     Marched up to Freedom Plaza.

10            Q     From Harry's?

11            A     From Harry's, yeah. It was a direct march. We walked up there, listened  
12     to some speeches, Trump flew over in the helicopters, and we left there, walked to the  
13     monument, stood up at the Washington Monument. That was one of the favorite  
14     places for everyone to go when they got there.

15            Q     Was -- so, if you recall that text message that we looked at earlier from the  
16     individual named Charles Bowman, he said: Three-quarters of the Proud Boys are at the  
17     Washington Monument now.

18            Was there like a plan to meet at the monument, or was that just impromptu?

19            A     I think it was impromptu, unless Enrique had a plan to go there. I  
20     think -- but I think actually -- I don't think there was a plan, honestly, because I think  
21     when we were leaving there, we let out there and left the plaza and made a left, and I  
22     don't think anybody knew we were going. And I remember, after November 14th, we all  
23     went up to the monument. I said: Are we going to the monument?

24            And he was, like -- Enrique was, like: Yeah, we can go there. And we just all  
25     started going to the monument.

1 Q Was Mr. Tarrio leading this march?

2 A Yeah, yeah. There was about -- it was so disorganized, you know. It was  
3 very, very disorganized, but there was probably a line of about 25 or 30 of us up front,  
4 and we were all supposed to just keep the line so people weren't going in front of us,  
5 tripping everybody, and yeah, it was a pretty disorganized.

6 Q Was that -- I'll stop you for one second there. Was that a big issue because  
7 we'll talk about in a little bit on January 6th, Mr. Tarrio was pretty focused on having the  
8 Proud Boys march in a line. Was that as a result of the disorganization of  
9 December 12th or --

10 A I think it's just the disorganization of every time that they've ever tried to  
11 march, like, you know, I just don't -- like, every time they've ever tried to walk anywhere  
12 in a line, it's always just a cluster. Just terrible. Tripping over everyone. Cameras  
13 getting in the way. It was always a mess. I don't know if it was a direct result of  
14 December 12th.

15 Q Okay. So you started to march towards the Washington Monument.

16 A Yep. And the idea was to keep everybody up at the monument, keep them  
17 away from having interactions with counterprotesters. This way we could try to  
18 keep -- keep everything peaceful. Unfortunately, we had some -- some knucklehead  
19 guys that just decided they didn't want to go to the monument, and they were -- once we  
20 got to the monument, there were stages up there and speakers up there, so we were just  
21 hanging out there all day. Beautiful day.

22 It wasn't too cold, and so we were all just hanging out up there. Then we went  
23 to another little park over there, maybe down the hill and across the street. There was  
24 some food vendors out there. We got some food. But, yeah, some of the  
25 knuckleheads ran over to the Black Lives Matter Plaza during the day and ended up

1 getting in fights, which was a serious problem because we told everybody: Do not go  
2 over there. We're not here looking for a fight.

3 Unfortunately, so many people were hyped up from November 14th that I think  
4 they all wanted to go out and have their moment to go out there and, you know, be a  
5 hero or whatever they thought they were going to do, but, you know, that was,  
6 unfortunately, one of the biggest issues that led to problems within the club was guys just  
7 running off doing what they wanted to do.

8 So we went over got some food at the food vendors, and I think everybody took a  
9 break and went back to the hotels after that. And then came back down to Harry's  
10 because everyone was supposed to be meeting down there and having drinks, and that's  
11 when the counterprotesters started marching on Harry's again. So, yeah, we marched  
12 around a little bit. You want me to keep going, or do you have any questions on  
13 anything or --

14 Q No, yeah. You can just keep going. I guess I'll ask the question, so you  
15 said at that point in the evening that counterprotesters were kind of coming to Harry's?

16 A Uh-huh.

17 Q Okay. No, you can just continue from there.

18 A Okay. So, yeah. So we got to Harry's. Counterprotesters started trying  
19 to come around and get ways around the police, try to break through the police line  
20 again, and we -- I think -- because we didn't want them to --

21 Q One question for you, Mr. Bertino, sorry. Where was the police line, or  
22 where did you see police?

23 A Well, they kept shifting. The police had to keep moving to keep them  
24 from -- like, they had to have their bikes, and they would have to ride their bikes on the  
25 side of them and then block them off before they got to anybody else.

1           So that happened like multiple times where they were just -- the police had to ride  
2           on the side of them and block them off when they get to somewhere where they knew  
3           there was going to be confrontation or violence.

4           So we decided: Hey, let's -- let's march away from Harry's. This way we don't  
5           bring any trouble to Harry's. And maybe if we get out of here, they'll leave Harry's alone  
6           and the hotel. Because there was a lot of people staying in the hotel, and last thing we  
7           needed was fire or anything being set in that old hotel. It would have been a massacre.

8           So we got out of there. We started walking around and, again, there was large  
9           amount of Proud Boys, but there was an even bigger amount of just normies and normal  
10          people behind us. And they were all enthralled with us, and you never knew who was  
11          who. We'd be walking; we'd get to a police line. Then we'd turn around, and go back  
12          the other way. We'd run into a police line. So we were really trying to just get around  
13          the city and get away from Harry's.

14          And then I remember rocks getting thrown. I remember -- I had my helmet on, I  
15          think, and I got hit in the helmet with a rock; a big brick or something like that hit me  
16          there. I was thrown. I remember the crowd behind us, probably 5,000 people I would  
17          venture to guess, probably about 5,000 people at that point. We got to a police line,  
18          and you could see where the other protesters were. They had space in between us, and  
19          I remember a bunch of them trying to come up from behind and wanting a bunch of  
20          people, not specifically Proud Boys, but just anybody, telling them: Let's just break  
21          through the police line and go over there and go get them.

22          And I was, like -- you know, I grabbed a megaphone. I was, like: Absolutely  
23          not. Everybody turn around. Turn around.

24          So I managed to get everybody turned around and headed back to Harry's. And  
25          we got back to Harry's. We weren't there 10 minutes, and the guy who eventually

1 stabbed me came into the crowd by himself agitating, flipped out his knife.

2 So then, I guess, as soon as he flipped out his knife, he got hit. I saw the  
3 commotion starting, and I just saw this one guy with a crowd of, you know, 5,000 people  
4 on him. I was, like: Oh, shit. This guy's gonna die.

5 So I ran in, and just as I was running in, he was running out right towards me and  
6 aggressively came right at me. So I put my hands up to try to deflect him, and that's  
7 when he caught me.

8 Once I realized he was swinging, I was going to start fighting for my life, but that's  
9 when he caught me in the ribs and stabbed me. And, after that, I don't remember a lot  
10 from that, you know, obviously. That was -- that was up to the point that I remember.

11 Q Okay. Couple -- couple questions about that, I think. I think we at some  
12 point in this kind of evolution of events, there's the flag -- the flag or the sign burning,  
13 right?

14 A Uh-huh. The banner burning, yeah.

15 Q Yeah. Can you explain when that happened in relation to all the events you  
16 just described?

17 A That happened probably 5 minutes after we got back and 5 minutes before I  
18 got stabbed. It literally happened right before that.

19 Q Okay. And what do you recall of that sign burning, who brought the sign to  
20 the area, who -- because it came -- am I correct that it came from the Black Lives Matter  
21 Plaza?

22 A I don't remember the direction; I'll be honest with you. I'm terrible,  
23 especially down there in the city I don't know; I don't remember what direction we were  
24 facing or even -- I think we were right in front of Harry's. And there's a side street that  
25 shoots in towards whatever street is directly above Harry's. It came -- like, we saw the

1 sign being marched with a bunch of people from the distance that we couldn't see.

2 So everybody got ready because we thought that that was -- the  
3 counterprotesters had gotten passed the cops and they were marching for a fight. So  
4 everybody kind of lined up and was, like, ready to, like, defend everything, and we  
5 noticed that the sign was upside down, but there was a lot of like Black and yellow behind  
6 it. I was, like: Oh, okay, must be our guys. So, you know, once we figured out it was  
7 our guys, they came in, and we had no --

8 Q When that happened, as you see the sign approaching, where is Mr. Tarrio?

9 A I couldn't tell you. I don't remember.

10 Q You weren't with him at that point?

11 A No. I think we had been split up at that point. Again, it's night time.

12 Q Was he at Harry's and you just didn't know where at Harry's he was, or was  
13 he --

14 A He's on the street somewhere I would assume. When you say "at Harry's,"  
15 what we mean by "at Harry's" is in the road in front of Harry's.

16 Q Well, I guess -- yeah. And so to include the road in front of Harry's. I'm  
17 just making a distinction between the group that was at Harry's and the group that had  
18 gone off separately --

19 A Yes. Yes, sir. He was at Harry's. He was not out ripping the sign down  
20 or anything like that.

21 Q Okay.

22 A That group was totally separate. We had passed by them a few times that  
23 night. Kept trying to get them to join in, join with us, and not run off on their own, but  
24 they didn't listen.

25 Q Do you know, was that group like being led by anybody in particular or any

1 chapter in particular?

2 A No. I wouldn't know who they were to begin with honestly. I don't who  
3 was leading that. I can't remember any of that from that night.

4 Q So the sign comes back to Harry's --

5 A Uh-huh. Yep.

6 Q -- brought by a different group of Proud Boys, and then what happens?

7 A Somebody said: Let's burn it.

8 And somebody pulled out lighter fluid. And I thought it was odd; like, what are  
9 you doing with lighter fluid here? Like, what's the point? I guess they assumed that  
10 they might need to set something on fire like a flag or something that they took from  
11 somebody. So they brought lighter fluid and poured lighter fluid on it. And I  
12 remember them lighting it up, and a huge crowd of people came around. And shortly  
13 after that is when the stabbing occurs. I mean, it was one after another.

14 Q What was Mr. Tarrio's involvement, if any, with the actual burning of the  
15 flag?

16 A He couldn't get his lighter started. So that picture you see of him trying to,  
17 you know, burn the flag, what he went to jail for or whatever, he got arrested for, he  
18 never actually burned it. He was kneeling down, and he just flicked his lighter, and  
19 somebody got a picture of him while he was flicking his lighter. And so he never actually  
20 burned it. I don't know -- I don't know who actually got the fire started, but he never  
21 actually burned it.

22 Q Was that understood among Proud Boys that Tarrio wasn't actually the one  
23 that lit the sign on fire?

24 A Yeah, I think so.

25 Q Did he explain to you why he then later took responsibility for that or

1 claimed he had done it?

2 A Yeah. I think he said that he would rather take it than anybody else get in  
3 trouble -- any of the guys that, you know, couldn't be identified, he said: I'm just going  
4 to take it so nobody else gets arrested. I'll take the charge for it.

5 Q Okay. So then, shortly after you -- one thing you had described was that  
6 you -- the man that stabbed you that you saw that he was in a large crowd of people, and  
7 you thought he was going to die and so you ran towards him and the center of that  
8 crowd. What was your -- what were you thinking, or what was your intention?

9 A Well, I mean, when I say, "Oh, my God, this guy's going to die," I'm being  
10 dramatic. He walked in there with intent to agitate the crowd. That's what he came in  
11 there doing. He was masked up. He came in there to agitate the crowd. My intent  
12 was to get -- like, because they gave him, like, a wide berth. Everybody was, like: You  
13 got free ability to walk away. Go ahead and walk away.

14 You can see it in all the videos. I don't know if you've actually watched any of  
15 them. He had free berth to walk away.

16 And they're like: Go ahead, just go.

17 Everybody tried to usher him out. He wouldn't go. And I guess it's when he  
18 flipped the knife out, people started flipping out. And my intention of going over there  
19 was not to hurt him or anybody else. My intention was to go over there and try to get in  
20 the middle of it and stop it so that nobody -- first, nobody got stabbed by him, and,  
21 second, nobody took the knife from him and killed him with it, you know what I mean?

22 Like, you just never know what's going to happen in that situation. It's volatile  
23 when there's a lot of people on either side of something; violence can erupt like that.

24 So my idea was get over there, put a stop to it, get that guy out of there. I don't care if I  
25 had to walk him out of there myself, and that was the plan. Well, that plan didn't work



1 out very well, so --

2 Q Understood.

3 A Yeah.

4 Q Well, I'm sorry to make you recount that story and kind of bring back that  
5 trauma --

6 A That's fine.

7 Q -- but I appreciate you answering those questions.

8 A Yeah.

9 Q And, again, not to kind of dig back up those issues, but can you just describe  
10 generally your injuries from that event for me?

11 A Yeah. I was stabbed in the -- it's about 3 inches lower than my heart. I  
12 mean, I could show you the scars if you want to see.

13 Q That's fine.

14 A Yeah. I got stabbed -- the knife went through a rib, broke my rib, went into  
15 my diaphragm, punctured my lung, and so that was the initial injury. They had to cut  
16 me open and get in and sew up my diaphragm, and I guess the lung healed on its own.

17 And they thought, after the first surgery, they thought that I still had internal  
18 bleeding because my blood pressure was low. So they had to cut me again from my  
19 bellybutton down to my pelvic bone and go into my stomach and try to figure out where  
20 the rest of the bleeding was. I had a chest needle inserted in the ambulance because I  
21 couldn't breathe because my lungs were filling up with blood, and that's the extent of it.

22 I was in the intensive care for 3 or 4 days I think. So that was the extent of the  
23 injuries. Plus, obviously, pain for the rest of my life in those -- I can't stretch out my arm  
24 like I used to. I've got a huge knot right on my lateral muscle, broken bone that they  
25 didn't fix. So, yeah, that's the extent of my injuries there.

1

2 [3:02 p.m.]

3 BY [REDACTED]:

4 Q And there were three other Proud Boys that also suffered stab wounds that  
5 night?

6 A Yeah, from the same gentleman, yes.

7 Q Did you know them?

8 A Not before, but after, obviously, yeah.

9 Q Yeah. Okay. Let's -- I guess we'll take different kind of time periods, and I  
10 kind of want to understand how your feelings about your involvement with Proud Boys  
11 activities and the Proud Boys evolved after that, that stabbing.

12 But just taking that, that incident and the time around it, what -- I mean, what was  
13 your reaction? How did it -- if it did -- change your plans about how involved you were  
14 going to be in the Proud Boys?

15 And then we'll just for that immediate period, and then we'll kind of talk about the  
16 evolution of January 6th and when those plans started coming about.

17 But after the stabbing, what did you -- what was your kind of intention?

18 A As far as how the stabbing affected the club you're saying, like as a whole?

19 Q More about you and your involvement?

20 A Oh, my involvement? Obviously, I was not going to be involved on the  
21 same level that I was before. After sustaining that sort of injury, almost dying, I had no  
22 desire to be back out at rallies. I almost lost my life. I almost never got to see my kids  
23 again. So I really didn't have an interest in getting back out there right away. It was  
24 definitely not in the plans.

25 The creation of the MOSD I think kind of stemmed with the idea that I was told

1 what it was supposed to be stemmed from that night and basically trying to keep guys  
2 from, number one, breaking the rules or the laws; and, number two, keep everyone from  
3 getting hurt and getting stabbed or shot or whatever else.

4 So that was the reason that kind of -- those two events are kind of linked together.

5 Q We'll go into a little bit more detail about how plans for the 6th started to  
6 evolve and when they first came up. But kind of skipping through some of that for now,  
7 when you learned of the 6th, was there a period of time that you were going to try to go  
8 to D.C. for January 6th or that you planned to go?

9 A Yeah, I thought about going to possibly speak on a stage, and that was going  
10 to be the only reason I would have gone. Logistically, it wouldn't have worked out. I  
11 mean, I could barely walk at that time. And guys were like, oh, we'll get you a scooter,  
12 we'll get you whatever. And I thought about it, and I was, like, no, I can't risk getting  
13 reinjured. I mean, I still got staples and all types of stuff. It's barely healed, still  
14 bleeding.

15 So, no, I decided I wasn't going.

16 Q Okay. All right. We'll get into a little bit more detail about the timing of  
17 that decision.

18 Do we have any questions from anybody else, [REDACTED]  
19 [REDACTED], any questions about the 12th before I move on?

20 [REDACTED] No, thanks.

21 [REDACTED] Great.

22 Okay. Anything else you want to talk about, Mr. Bertino, about December 12th  
23 or anything that I might have missed or that you think is important that we didn't cover?

24 The Witness. No, I don't.

25 Mr. Wellborn. Let's hang on a sec.

1 [Discussion off the record.]

2 The Witness. All right. So after I had a discussion with my attorney earlier,  
3 some of the vetting practices that we used to do in the club -- I don't know if I mentioned  
4 that earlier -- it used to be you'd go in for a certain amount of time.

5 After the "stand back, stand by," and after December 12th, which was huge, those  
6 practices were pretty much -- didn't exist. It's pretty much they were just letting  
7 everyone and anyone in.

8 Yeah, that's just an important kind of thing, between all these three events,  
9 how just about anybody was running around claiming to be Proud Boys at that point too.

10 BY [REDACTED]:

11 Q Okay. And then, before we move on from the 12th, specifically, I want to  
12 track a little bit more Mr. Tarrio's activities on the 12th, and then kind of your  
13 conversations with him about the 12th afterwards, recognizing you were obviously  
14 preoccupied there.

15 Are you aware -- I think you've said you didn't meet any Oath Keepers on  
16 December 12th, is that correct, or that you're aware of you didn't?

17 A Yeah, not that I was particularly aware of.

18 Q Do you remember seeing Oath Keepers at the December 12th rally?

19 A Again, I think it was same type of guys that had, like, the Kevlar on and the  
20 vests. Most of the time I looked at them to see if they had the laurels on, the Proud  
21 Boys laurels on or whatever. They may have been Oath Keepers.

22 But, specifically, me knowing this person is an Oath Keeper, me knowing that  
23 person's an Oath Keeper, no, I wouldn't, I wouldn't have known anybody specific that was  
24 there that was an Oath Keeper.

25 Q Okay. And I think you said that at this point you did not know -- I know you

1       said you hadn't met Stewart Rhodes.   But did you know who he was at that time?

2           A    No, I didn't know who Stewart Rhodes was until he was arrested on sedition  
3       charges.

4           Q    Okay.

5           A    I had never even heard of Stewart Rhodes until then.

6           Q    So do I take it then that, as of December 12th, you didn't know any Oath  
7       Keeper by name and had never heard of a name of an Oath Keeper?

8           A    By December 12th?   I mean, I had heard Oath Keepers before, the name  
9       Oath Keepers before.   But to be able to say this person is a president of an Oath Keepers  
10      chapter, no, I wouldn't, wouldn't specifically know.

11          Q    One individual Oath Keeper that I want to ask you about and give you a  
12      name of is Kelly Meggs.   Do you know that name now?

13          A    No.

14          Q    No?   Okay.   He was an Oath Keeper.   We've heard from other witnesses  
15      that he and Mr. Tarrio met on December 12th.

16          A    Oh, I thought -- I've heard the name, but I thought that was a female.

17          Q    Yeah.   No, Kelly Meggs is a male.

18          A    Okay.   Yeah.   No, I don't know.

19          Q    Okay.   All right.   Then let's talk about the kind of interim period between  
20      December 12th and January 6th.

21               First thing I want to ask is when was the first that you heard of January 6th being  
22      an event of some importance or a date of importance?

23          A    I honestly don't recall.   I mean, I don't remember when I first heard about  
24      it.   I'm not even going to try to answer that and say that I -- I didn't know exactly when.

25          Q    Did you follow President Trump on Twitter at the time?

1           A    No, I was banned from Twitter.

2           Q    Did you see -- you know, I don't really use Twitter and don't have a Twitter  
3   account that I've logged into, but I still see those tweets online.   And, certainly, at the  
4   time I wasn't following him on Twitter, but I was seeing his tweets all the time, just kind  
5   of online and in the news.   Is that same case for you, you would see them kind of  
6   posted?

7           A    Yeah, it depends on when the timeline came out, obviously.   I mean, I was  
8   in recovery for a while.   I may have been sitting home watching stuff.   But my memory  
9   is very, very shot from that point.

10          Q    Maybe that will probably help our conversation a little bit.   Can you tell me,  
11   kind of go through a little bit your stages of recovery and kind of where you were in your  
12   sort of awareness at different points between December 12th and January 6th?

13          A    I'd say honest -- and this is no BS -- my girlfriend still brings up stuff to me  
14   that I did, like, in -- that I don't remember doing.   I was, like, she said something today,  
15   and I was like, I didn't do that then.   She's like, yeah, you did.

16               Between December 12th and I'd say almost March, a lot of my stuff was hazy.   I  
17   was dealing with -- she said I was a different person after I was stabbed, dealing with  
18   PTSD.   For the first, I'd say, I think it was 30 or so days, I was on Oxycodone for the pain,  
19   recovering from the stabbing.

20          Q    How many days was that?

21          A    I think 30 days, if I can remember correctly.   I think that's what the  
22   prescription I had was.   Again, my memory is pretty hazy, so I don't remember.

23          Q    And you were, you said, I think, in the ICU for 4 days?

24          A    Yeah, 3 or 4 days at least.   Yeah.

25          Q    December 12th to the 15th or 16th.

1           Do you remember when you returned to North Carolina?

2           A     Yeah, I was released the following Sunday, I believe.   So this happened on  
3           Saturday, and I was released the following Sunday.   So I spent the whole week there,  
4           and then another day, I believe, that's when I came home.   It may have been Saturday  
5           night, too, but I don't think so.   I think it was Sunday I came home.

6           Q     Okay.   So December 12th, Saturday, and then sometime either the 19th or  
7           the 20th of December, that's the Saturday and the Sunday is when you got back to North  
8           Carolina?

9           A     Uh-huh.   Uh-huh.

10          Q     And how did you get back?

11          A     My brother flew in from Florida and picked my car up from the parking lot  
12          and then drove me back to Charlotte and then flew out to Florida from there.

13          Q     Okay.   And I think you had mentioned you drove -- obviously, you drove up  
14          since you were returning your car.   Did you drive with anybody up for December 12th?

15          A     I don't believe so, no.   I think that trip I was by myself too.

16          Q     So for November and December, were there just not other members of your  
17          chapter going to those events or why --

18          A     They were.   I just choose -- like, I like quiet when I drive.   I don't want a  
19          bunch of people in my car.   I just like to be by myself and drive in the quiet.   So that's  
20          probably why.

21                I think the second time when Bill rode with me it was just he couldn't get a ride or  
22          didn't want to drive his truck up there, so I said I would take him.

23                But, yeah.   So, again, my memory is quite hazy through a lot of that.   So I will do  
24          my best to explain whatever I can.   If I don't remember, I'm just going to tell you I don't  
25          remember.

1 Q Sure. That's fine. Okay, then, let's start, I was asking kind of when the  
2 first time you heard about January 6th being an important date. And I just wanted to  
3 show you one of these -- one of the tweets from President Trump.

4 If we, [REDACTED], can pull up exhibit 4. And you can zoom into the text at the top  
5 so Mr. Bertino can read that.

6 A I can read it.

7 Q You can read it? Okay.

8 A I can see it pretty good from there, yeah.

9 Q Then that's fine. We can leave it here. I'll just give you a second to read  
10 that.

11 A Yeah, got it.

12 Q In particular, that last line that I'm going to draw your attention to, "Biggest  
13 protest in D.C. on" -- or, "Big protest in D.C. on January 6th. Be there, be wild!"

14 A Uh-huh.

15 Q Do you remember that tweet at all or that phrase sort of became part of the  
16 organizational or rallying cry around the event, a wild event. One of the websites, main  
17 organizing websites of the event was called Wild Protest.

18 Do you remember that tweet or that terminology?

19 A I remember hearing it. I can't, specifically, say when I heard it. But I do  
20 remember unequivocally hearing it, yes.

21 Q Okay. And what did you understand was going to happen on the 6th, or  
22 what was the 6th supposed to be, or why was the rally going to be held on the 6th, to  
23 your understanding at that time?

24 A At that? When I first heard about it, I had no -- I didn't know.

25 Q Okay.



1           A    I thought that everything had already been -- because I think -- I think the  
2   States had already sent in their stuff. I thought everything was pretty much over at that  
3   point, over and done.

4           And then I think -- I think I learned of it, like, a day or two before, that it was  
5   actually still had to be certified. I don't know. I was quite confused on what was  
6   happening. There was so much misinformation out there and so much QAnon crap out  
7   there that nobody knew what to believe.

8           Q    Right, okay. But at some point, either a couple of days or a day before the  
9   6th, you came to understand that there was going to be the certification of electoral  
10   votes on that day?

11          A    Yeah, I guess they had to vote. That's when Congress or the House -- I  
12   couldn't remember which one -- would go up and certify, yeah. So I learned about that  
13   a couple days beforehand, yes.

14          Q    And then I asked previously, but do you remember specifically this word  
15   "wild" being used in connection with January 6th?

16          A    Just at that tweet, yeah.

17          Q    And what did that mean to you? Or as you were discussing with other  
18   Proud Boys, what did you think Mr. Trump meant?

19          A    I don't know. A lot of times when he would say things you just didn't know.  
20   I mean, it was -- he always used these "humongous" and "tremendous" and all these  
21   words, adjectives.

22          And so at that point I never really noticed it or thought it was anything of  
23   importance, the "be wild" thing. I didn't associate at that time with anything that did  
24   happen that day. I didn't put the two together.

25          Q    Okay. We can take down this tweet.

1           Okay. Let's talk a little bit just kind of about the MOSD chats and MOSD in  
2           general and how that started.

3           Do you remember when you first heard about MOSD?

4           A    I don't remember the exact date. However, I remember either Enrique  
5           called me or added me to a chat and said, hey, this is the plan that I -- this is what I think  
6           we should do. It was in the works for a couple of weeks.

7           Everyone that joined had to agree to what it was supposed to be, and it  
8           was supposed, like I said earlier, it was supposed to be kind of like a trial run to see if guys  
9           would be willing to follow the rules and not run off and get arrested and not run off and  
10          get hurt or not run off and hurt anybody else.

11          It's kind of like a trial thing to try to get -- see could we keep guys together and  
12          keep them from doing stupid things while they're out on the street; keep people from  
13          getting hurt, keep them from hurting anyone else, and keep them from getting arrested  
14          or breaking the law.

15          Q    We'll talk a little bit about the kind of the intention or the purpose of MOSD,  
16          but I want to focus on the timeline at least to start with or kind of when it started.

17          So you said that Tarrio created a group chat, and I think you said he gave you a call  
18          about it and then added you to the chat?

19          A    I can't remember specifically how it was brought to me. But it was  
20          probably one of those two ways because we didn't talk about it in person. So it was  
21          probably either a phone call, a text, or in a chat similar.

22          Q    And then do you remember eventually, I guess, being added to an initial  
23          group chat of just the leaders of the MOSD group?

24          A    I think so, yeah.

25          Q    And I want to try to approximate around when that happened. Do you

1 remember if it was before Christmas or after Christmas?

2 A I couldn't tell you. I'll be honest with you. If I remembered, I'd tell you,  
3 but I just -- I can't remember.

4 Q Sure. This kind of -- from here on out, I'm going to be referencing the  
5 indictment of Mr. Tarrio and some other individuals, Proud Boys individuals.

6 And so if we can pull that up, that's going to be exhibit 7. And, [REDACTED], if you  
7 can pull that up real quick. Okay.

8 Okay. And then let's go to -- and, again, just for the record, this is the indictment  
9 of Mr. Tarrio, and then other individuals, Mr. Nordean, Biggs, Rehl, Donohoe, and  
10 Pezzola.

11 And let's go to page 10. And can you read this, or you need us to zoom in a little  
12 bit?

13 A Probably have to zoom in a little bit on this one.

14 Q Okay. Let's zoom in a little.

15 All right. So a couple questions.

16 So paragraph 30 there notes that it was on the 20th that Mr. Tarrio created the  
17 MOSD Leaders Group, which included Nordean, Biggs, Rehl, Donohoe, person 2 and 3.  
18 And then person 1 was subsequently added to the message group for MOSD leaders.

19 I take it now, do you understand, are you person 1 in this indictment?

20 A I don't know which person I am in that. I have no idea.

21 Q I can point you to the section of the indictment. And we can do that in a  
22 second. But person 1 is described as somebody who was stabbed, suffered a stabbing  
23 incident on December 12th.

24 A Then I would assume it was either me or the other four guys -- one of the  
25 other four guys that was stabbed. But I would probably assume that it would be me,

1       yes.

2               Q     There's also mention that person 1 received a visit from Mr. Pezzola around  
3       December 29th and December 30th to deliver a shield, a decorative shield?

4               A     Uh-huh.

5               Q     And so I take it that's you?

6               A     Yes, sir.   So I would assume that I'm person 1 then.

7               Q     Okay.   So I wanted to ask you quickly, if you look at paragraph 31, it says,  
8       "On December 20th, 2020, person 3 posted a message to the MOSD Leaders Group that  
9       stated, 'I am assuming most of the protest will be at the Capitol Building given what's  
10      going on inside.'   In response, Tarrío proposed a video chat, which would take place on  
11      December 21st, to discuss the MOSD and January 6th."

12              Do you know if you participated in the video chat on the 21st?

13              A     The 21st?   I don't recall, to be honest with you.   Again, my dates are  
14      screwy, my times are screwy.   It may have been.   I don't know.

15              Q     Do you remember an earlier -- so I know there are some subsequent video  
16      chats with larger groups of Proud Boys that were either being considered for MOSD or  
17      were in MOSD.   Do you remember any of those video chats?

18              A     Yeah, I do remember doing one of them.

19              Q     Okay.   And what's the one that you remember?   Can you describe it?

20              A     It was just -- it was me and a couple of the other guys and some of the guys  
21      that were wanting to -- that were checking it out and seeing what it was about.   And  
22      basically Enrique explained what it was supposed to be.

23              Q     And about how many people do you think were on that video chat?

24              A     I couldn't tell you, to be honest with you, I don't know.

25              Q     Are you talking about, like, 6 to 8 or, like, over 20?

1           A    It could have been more than 20.   But, again, I don't know.

2           Q    It sounds like -- I'm just -- I'm trying to place it.

3                So this one that's discussed in paragraph 31 that takes place on  
4   December 20th -- or, sorry, the one proposed for December 21st that was discussed on  
5   December 20th -- sounds like it's just a few individuals, basically, Tarrio, Biggs, Nordean,  
6   and then Rehl, you, and then two other individuals.

7                It sound like this one you're talking about was a larger group than that?

8           A    Yeah, the one that I remember, yes.   I don't remember this.   I don't  
9   remember that one.   I don't know if it -- does it say it actually took place or --

10          Q    I'm not aware if it actually took place.

11          A    Yeah.   I don't know that.   Because the only video chat I remember being  
12   in was that large one with everybody else.   I don't remember actually doing another  
13   video chat.

14          Q    Okay.   Do you remember sort of the structure of the MOSD leadership?  
15   The indictment describes it as Marketing Council, an Operations Council.   Each of those  
16   were three people.   Marketing was Tarrio, Biggs, and Nordean, and the Operations  
17   Council was Rehl, person 3, and another individual.

18                And then it says you were designated as a regional leader.   Do you recall that?

19          A    Vaguely.   It wasn't anything that lasted very long.   So, yeah, vaguely.

20          Q    Do you know -- do you recall what your region was?

21          A    No, I don't.

22          Q    Do you remember any of the other regional leaders?

23          A    Well, I mean, I don't know, because there's only like six or seven people in  
24   there, right?   And you just named off, like, six of them.   So I don't -- I don't know  
25   who -- who else was in what position, to be honest with you at this point, I don't

1 remember.

2 Q So it says at least that Donohoe and you and person 2 were designated as  
3 regional leaders. I was just a little curious about that because Donohoe is from North  
4 Carolina also, right?

5 A Yeah, yeah, so it did not make a whole lot of -- it didn't make a whole lot of  
6 sense.

7 Q Do you mean now, looking at it, it didn't make a whole lot of sense or at the  
8 time you remember --

9 A I don't think it made a whole lot of sense at the time either.

10 Q Okay. And this is Tarrio kind of dictating how this MOSD group is going to  
11 run?

12 A Yeah, I think so, yeah.

13 Q Was anybody else that you can recall kind of particularly involved in helping  
14 Tarrio develop the MOSD group?

15 A Not that I'm aware of. I don't know who else had a hand in it or who else  
16 he was talking to. I have no idea.

17 Q All right. Let's take down exhibit 7 for a second.

18 So around that same time, where Trump tweets on December 19th and then  
19 MOSD is created in the following days, there's also some messages I want to draw your  
20 attention to.

21 Let's pull up exhibit 5.

22 So we previously discussed Mr. Meggs, Kelly Meggs, who is an Oath Keeper. And  
23 I'll represent to you he was around the time of January 6th the president of the Florida  
24 Oath Keepers.

25 And if we can just keep this message up.

1           So this is a Facebook message sent by Mr. Meggs on December 19th. And he  
2           says, "We're all ready for the rioters. This week I organized an alliance between Oath  
3           Keepers, Florida Three Percenters, and Proud Boys. We have decided to work together  
4           and shut this shit down."

5           Did you ever hear about any communications between Proud Boys and Oath  
6           Keepers or any sort of alliance at this time?

7           A    Not at that time, no, no.

8           Q    Okay. And how about --

9           A    Nothing that I would have heard of directly, no.

10          Q    Sorry. Repeat that one more time?

11          A    Nothing that I would have heard of. Nothing that would have been  
12          brought to me, no.

13          Q    Okay. And then how about later? At any point did you hear about that?

14          A    Well, obviously, through the news after the indictments and stuff were  
15          released, yeah, I heard about it then.

16          Q    Okay. And then so I know you said you talked to Mr. Tarrio, I think, after  
17          he was released from jail in January timeframe.

18          A    Uh-huh.

19          Q    And then before he was arrested again.

20          A    Yes.

21          Q    Having heard about some of this that was going on around January 6th and  
22          this alliance between Oath Keepers and Proud Boys and Three Percenters, have you ever  
23          since had a conversation with Mr. Tarrio about kind of what was going on at this time?

24          A    I think the only thing that he -- I don't remember that we specifically got into  
25          it. I think the only thing that he said was that somebody had recorded him being in the

1 parking lot or the underground parking garage, and Stewart was there after he got out of  
2 jail in January before the 6th, the previous January.

3 So I think his kind of take on the whole thing was, like, no, man, that's a bunch of  
4 BS. They just, you know, happened to -- they happened to -- he happened to be in the  
5 parking garage at the same time I was and somebody videoed it and whatever. And he  
6 was like, man, it's pretty serious. They're charging him with sedition and whatever.

7 I think that's pretty much all that he told me about it anyway. He didn't indicate  
8 to me that they had talked or had a lot of communication or anything like that. So I  
9 wouldn't know anything more than that.

10 Q Have you ever discussed Meggs with Tarrio since the 6th?

11 A No. I honestly, when I heard the name, my honest take is I thought it was  
12 another one of his girlfriends. So I didn't make assumptions either way. I just, you  
13 know, I thought it was another one of his girlfriends.

14 Q Okay. I guess looking back on this now -- and actually let's scroll to the next  
15 page, there is another message. So, yeah. So those first two messages.

16 Again, Kelly Meggs, this was on December 22nd. "Plus, we made contact with  
17 PB, and they always have a big group, force multiplier." And then, again on the 22nd,  
18 another message from Kelly Meggs. "I figured we could splinter off the main group of  
19 PB and come up behind them, fucking crush them for good."

20 So I guess, looking back at this and the indication of contact with Proud Boys and  
21 Oath Keepers, are you surprised by that? What's your reaction to the idea that Mr.  
22 Tarrio was potentially communicating with Oath Keepers?

23 A If that's the case, yeah, I mean I -- he had his plans, and nobody else knew  
24 about it. So I don't know. I don't really have a reaction at this point other than I'm still  
25 stunned about everyone -- all this information that's coming out after. Still a lot to take



1 in.

2 One way I could look at it is, if you have direct communication between Kelly and  
3 Enrique, then that would show that Kelly was obviously telling the truth, or sometimes  
4 guys get in these chats and throw out just random stupid thoughts and ideas. It  
5 happens a lot.

6 So, I mean, I don't really know at this point which way to classify this one. You  
7 know what I mean?

8 Q Yeah. I'm happy to show you two other bits of information, and then  
9 maybe we can revisit that thought.

10 If we can pull up exhibit 36.

11 So, one, as we're pulling that up, and I can show up the records of this, too, we do  
12 have -- we have call records -- not evidence of the substantive things that were discussed  
13 or calls -- calls and text messages.

14 And we've identified one call between Mr. Tarrio and Mr. Meggs on  
15 December 19th. So the same day that he posts that Facebook message we just read  
16 they were in contact by phone for a few minutes.

17 And then this is a Signal group chat of Oath Keepers related to planning for the  
18 January 6th event. And if you look at that top message, that's from Mr. Meggs on  
19 January 4th, the day that Tarrio's arrested, and he sends to his group a tweet about Mr.  
20 Tarrio's arrest.

21 And then at the bottom you'll see there Mr. Meggs says, "Not confirmed. I just  
22 called him. No answer." Then there's a typo that he corrects, but he means to say,  
23 "but he will call if he's out."

24 So I guess that's all to say. We do have evidence of a phone call, at least one  
25 phone call. Obviously, we have not the same for the records for Telegram or Signal

1 messages, and a statement from Mr. Meggs that he attempted to call Tarrio on  
2 January 4th but couldn't reach him, which would make sense because his phone had been  
3 confiscated.

4 I guess now is there -- given the other events that you've talked about Mr. Tarrio  
5 kind of holding close to his chest like Mr. Jones, and we haven't talked yet about the  
6 "1776 Returns" document, but --

7 A Absolutely possible that they had some planning going on. I don't know.  
8 I can't be specific on who he's referencing crushing or whatever in that messaging. I  
9 hope you understand that.

10 Q Right.

11 A But obviously there was a -- there was some communication, and there was  
12 this guy going and saying, hey, I've talked to the leader of the Proud Boys.

13 But, again, Enrique plays everything close to the chest. So he won't tell you -- he  
14 wouldn't tell you there's an alliance or there's anything going on until pretty much after it  
15 happened. It was just kind of the way he did things.

16 Q Okay. And then let's -- so let's go back a little bit to kind of your timeline of  
17 when -- you can pull this exhibit down. Thank you.

18 Your timeline. I guess you said there was a period of time where you thought  
19 you might try to go up for the 6th and then determined that that was just not going to be  
20 possible given your condition.

21 A Briefly, yeah.

22 Q Yeah. When was the period of time that you thought you might go up?  
23 And then when did you decide that's not going to happen?

24 A I can't remember the date, but it was obviously right before then. I can't  
25 remember the specific date off the top of my head.

1 Q Okay.

2 A It was literally for a brief moment I thought about going.

3 Q Okay. Would you say you made that decision a couple days before the 6th  
4 or well in advance of the 6th you realized you weren't going to recover enough?

5 A I think once -- the only reason that I would have ever even thought to go up  
6 was if I was going to speak or be able to stand up there and show what I had just went  
7 through and whatnot. That would have been the only reason I was going to go.

8 So I think once Trump decided he was going to be speaking, that's when all the  
9 other stuff got cancelled. And so that's when any small thought I had about going  
10 up -- again, it was a small thought because I was like, I don't know how logistically it's  
11 going to work. I can't drive for that long. I can't sit for very long. I won't have the  
12 energy. I can't walk through a crowd in case I get bumped.

13 So, yeah, briefly. But as soon as that happened that Trump said he was going to  
14 speak, like, that was off the table. I was like, yeah, any thoughts of me going is done, I'm  
15 not doing that.

16 Q And so you said, I think, that you were planning on going to the 6th or the  
17 interest in going to the 6th was that you might speak at one of the events. Is that right?

18 A Yes.

19 Q What did you hear about that, or how were you going to end up as a  
20 speaker?

21 A Well, I asked Enrique. Enrique said he was speaking, and I said, hey, let me  
22 come up on the stage with you or something or see if they need an extra speaker, I'd love  
23 to go up and talk. And I never heard anything back.

24 But just that thought of possibly going up to do that was the only, like I said, the  
25 only reason I planned on going there and that was just for a brief moment.

1 But I never heard back from him because I think before a decision was ever even  
2 made about that or even got a chance to talk to anybody about it, Trump decided he was  
3 going to be speaking. So all the other stages got canceled.

4 Q Okay. What did you plan to go up and speak about? What did you want  
5 to talk about?

6 A Well, just about my stabbing, about how I'm still here, I'm alive. God's  
7 grace saved me. Just that sort of thing.

8 Q Okay. I guess how would that relate to the events going on on January 6th,  
9 or what was the tie-in?

10 A I don't think there was a direct tie-in. Just using my story as an example of  
11 how -- maybe how the prosecution seemed a little bit tipped the opposite way,  
12 considering the person that stabbed me never even got charged and I was definitely a  
13 little angry about that at that point. So I probably would have just sounded off about  
14 that. Yeah.

15 Q And then just to try to get some of the timeline down, I wanted to show you  
16 another document.

17 If we could pull up exhibit 34.

18 So these are some emails among the organizers of the January 5th and  
19 January 6th events.

20 And we can zoom into the -- just that email at the top so that you can read it.  
21 The relevant -- yeah, tell me if you're able to see that.

22 A Yes, we can now.

23 Q Okay. Great.

24 So the relevant part to note is that these are emails on January 3rd. And you'll  
25 see the name of the attachment is "Guestlist.0106."

1           A    Uh-huh.

2           Q    And then if we scroll down.  Basically, it's an email from this individual  
3   Kristin Davis saying here's the guest list and our VIP list.  We're going to scroll down  
4   to -- if you look at item -- individuals 36 and 35.  Mr. Tarrio is listed as a speaker for the  
5   5th, and then you're listed as his plus 1.  So --

6           A    Yeah, he did reach out.

7           Q    Do you think that up until, like, about January 3rd, 2nd or 3rd, you were still  
8   planning on going up for the 6th?

9           A    Like I said, whatever date Trump came out and announced that he was going  
10  is when I had decided I wasn't.  So whether this happened -- whether this was still sitting  
11  there or whether Enrique changed it or changed his guess list or whatever, I don't know  
12  when this was made.

13                But, yeah, pretty much the minute that Trump said he was speaking I had decided  
14  I was not going.  So whether that correlates with this document, I don't know, but that  
15  was definitely the day I decided I wasn't going.

16           Q    Okay.  All right.  Let's pull this exhibit down then.

17                And then I wanted to ask you a little bit about Mr. Pezzola and this shield that he  
18  brought down to you.

19           A    Right.

20           Q    And I don't think we've talked about Mr. Pezzola yet.  So can you just tell  
21  me how you know him?

22           A    We lost his audio, I think.

23           Q    Sorry.  I don't know how that happened.

24           A    I know him and what?

25           Q    How do you know him and what your relationship is with him.

1           A     Okay. So I met him for the first time that I remember when he drove the  
2 shield down to my house. The night I was stabbed, apparently, he was there. We took  
3 a picture together. I couldn't remember it. But that's how I actually know Dominic  
4 Pezzola.

5           While he was down there we made a crazy discovery that we had actually grown  
6 up and had some of the same friends in the same neighborhood that we grew up. And  
7 one of our close mutual friends had died in a snow mobile accident a few years prior.  
8 And we happened to end up talking about a party where he had to stop a guy from  
9 getting jumped and how -- and Dominic said, man, I was at that party. And I was like,  
10 wow, I was at that party too.

11           So we grew up in the same town. I never knew Dominic directly. Been to the  
12 same house party with him, but didn't know him. And then eventually it's just kind of  
13 weird how that ended up working out while he was down there.

14           But, yeah, so that's all the story on how I know Pezzola. I didn't know much of  
15 him. We spent about 30 minutes at my house when he dropped off the shield, asked  
16 how I was doing, wanted to see the scars, and all that stuff, and then took off because  
17 they had a party to get to.

18           Q     So a couple questions on the 12th. You said Mr. Pezzola was there, but you  
19 don't recall him --

20           A     I don't.

21           Q     -- being there?

22           A     I don't. I don't. I mean, you're talking -- there's thousands of people  
23 there. I couldn't recall. I took about 500 pictures of people that night. So I don't  
24 remember actually meeting with him that night.

25           Q     Was he, like, nearby when the stabbing occurred, or did he have some

1 special connection to that event?

2 A No. Apparently he was definitely nearby because he told me that he was  
3 one of the guys that took the guy down when he had the knife, and they finally got him  
4 down. He was one of the guys that took the guy down. And there was -- I think you  
5 can see him in some of the video when they were undoing the dog pile, I think you could  
6 see Dominic in there.

7 Q Okay. And then quick question. I think you told me at the beginning, but  
8 where -- what's the town that you and Mr. Pezzola --

9 A Rochester.

10 Q -- are from? In Rochester.

11 A Rochester, New York, yes.

12 Q Okay. And then why -- can you just describe the shield for me or the  
13 purpose of the shield, what was it?

14 A Just decorative. It was a decorative shield that -- a guy made these, like,  
15 they were, like, recreation Viking shields made of wood and whatever stuff they used to  
16 make them with. Bronze with little buttons on them. And just made a  
17 commemorative shield or decorative shield.

18 Q Was that common among the Proud Boys? Is a shield like a normal thing to  
19 give each other?

20 A No, that was -- it was -- like, I think December 12th one guy from New York  
21 was carrying it. And it was something -- nobody had seen a Viking shield out there  
22 before. And so pictures came up, and it got pretty popular. "Oh, man, those are really  
23 cool."

24 And then they just happened to say, hey, we're coming down to North Carolina.  
25 We know you're probably going to see Enrique soon. We'll bring you the shield down

1 and see if you can get it to Enrique. I said, sure, just leave it with me and I'll get it down  
2 there to him.

3 Q Okay. So the shield, the decorative shield wasn't created for you because  
4 of the stabbing, it was there on December 12th and somebody gave it to you kind of to  
5 commemorate the event?

6 A Well, they gave it to me to give it to Enrique, yes.

7 Q Okay. Sorry, I didn't hear that part.

8 A Yeah.

9 Q Why give it to you to give it to Enrique? Did you have plans to see him  
10 after that?

11 A Yeah. They just assumed that I would. They were coming down to North  
12 Carolina to party and come down to hang out with some of the North Carolina guys.  
13 And they were actually making me my own shield, which never got finished, never got  
14 done. And so they were like, oh, well, we'll bring you the shields down, and we'll give  
15 you the one for Enrique and we'll give you yours.

16 Well, mine never got done, but they brought the one down because they were  
17 coming down to party anyway. So they brought it to me and was like, hey, this is for  
18 Enrique, see if you can get it to him.

19 So that was the extent of that, the reasoning. And they wanted to come check  
20 on me to see how I was doing after the stabbing.

21 Q Did you wonder what happened to your shield? I mean, I feel like you  
22 deserved the shield as well.

23 A Yeah, I would love to have my shield. I don't know what happened to it.  
24 But I think the guy that was making them is not part of the organization anymore. And  
25 they even hand painted one for my daughter. I never got that one either. So, yeah.



1 Q Mr. Pezzola still is in the New York area, was associated with a New York  
2 chapter of the Proud Boys, right?

3 A I would assume so, yeah.

4 Q The shield -- and we can pull a picture, but I'm assuming you remember it  
5 had, like, a New York -- it was associated with the New York Proud Boys, in particular?

6 A Yeah, PBNY it said, I think, on it. Yellow and black, yeah.

7 Q Yeah. So any reason that would be given to Tarrio? I guess I'm just trying  
8 to understand what the shield was, what the purpose behind it was, and why did Tarrio  
9 get a shield from the New York Proud Boys?

10 A Probably -- I mean, he had a podcast, he could have hung it in the back of  
11 the podcast. I did on a couple of mine. I'd hang it back there just because it's a cool  
12 decoration. I guess it comes with perks of being a leader, I guess.

13 Q Okay. So then just chronologically, I guess, now is a good time to talk  
14 about the "1776 Returns" document because it's around the same time that Mr. Tarrio is  
15 shown or given this document.

16 So I think you told me at the time you had not heard of "1776 Returns", and to  
17 your knowledge Mr. Tarrio didn't share that -- well, let me ask that actually.

18 Did Mr. Tarrio share that document with anybody else that you know of?

19 A I do not know. I have no idea whether -- who he shared it with. I know I  
20 didn't see it. I never saw anything of it, never heard of it. And I thought everything I  
21 heard on the news about it was a lie until I was actually shown it.

22 Q Okay. And what have you learned about that document since or what's  
23 your -- have you -- you've seen the document then I take it?

24 A Yes.

25 Q Okay. And you're read it?

1           A     Briefly, briefly. I didn't get a chance to really study it. But, yes, I've briefly  
2     seen it.

3           Q     Okay. And you've read the document?

4           A     I have not read the whole thing, no. I did read small excerpts while I was  
5     meeting with the FBI. But that's -- I have not read the entire thing, no.

6           Q     Okay. Let's look at -- if we can pull up exhibit 7 and just see what the  
7     indictment says about the document and then we can talk about it a little bit more. It'll  
8     be, when exhibit 7 comes up, it'll be paragraph 41 on page 12. And let's zoom in a little  
9     bit to 41 so Mr. Bertino can read that. Okay.

10          And I'll give you a second to read it, and just tell me when you're done.

11          A     Okay. That's good. I can see it there. Can you see that?

12          Got it.

13          Q     Okay. Great. So as you just read, the indictment asserts that on  
14     December 30th and 31st Tarrío communicated with an individual about this document.

15          Do you know who that individual is?

16          A     I do not.

17          Q     So that was not disclosed to you at any point?

18          A     No.

19          Q     And then it describes that the plan that's laid out in the document is to  
20     occupy some, quote, "crucial buildings in Washington, D.C., on January 6th, including  
21     House and Senate office buildings around the Capitol with as many people as possible, to  
22     show our politicians we, the people, are in charge."

23          Is, from what you read of the document, is that -- that's an accurate reflection of  
24     what's in the document?

25          Mr. Wellborn. Well, I think we're going to interject there, because do you

1 actually recall verbatim what you recall reading at this office when the FBI showed you a  
2 small portion of that document?

3 The Witness. I do not.

4 Mr. Wellborn. Okay. I think that answers his question.

5 [REDACTED] Why don't you just tell me what you do recall of the document?

6 The Witness. The only thing -- can you give me one second?

7 [REDACTED] Sure.

8 [Discussion off the record.]

9 The Witness. Okay. So the only thing that sticks out in my mind was the code  
10 name for the Capitol Building, and I can explain why.

11 [REDACTED] Sure.

12 The Witness. On -- "1776" is not just the name of that document. Obviously, it  
13 means a lot of things. It was kind of a cry of freedom that people have used for a long  
14 time. 1776 was obviously an important year in our Nation.

15 So whenever something great would happen, we'd call it 1776. Or Alex Jones  
16 saying if the government comes to take our guns, 1776 will commence again, that sort of  
17 thing.

18 So during the -- when everything --

19 [REDACTED] I just want to pause there, I guess, for one second, because there is  
20 definitely a big difference between those two things that you just laid out.

21 One is saying -- using 1776 as kind of a superlative or just a comment that  
22 something is good, I guess. But if you're using 1776 in reference to an event where the  
23 guns -- the government comes to take your guns, I would think that invoking 1776 would  
24 be invoking a revolution, right?

25 Mr. Wellborn. Well, you might be, but I think he's just trying to explain.

1           [REDACTED] Sure. Okay. Yeah. Let's go ahead, and then we can ask some  
2 questions.

3           The Witness. So Enrique and I had, like, when everything was happening, like,  
4 after the breach and everything was happening, he had messaged me -- or I messaged  
5 him. I was like, holy shit, or something like that I said to him. And I was like, I can't  
6 believe this is happening, or something like that, and 1776. And then he replied with  
7 the Winter Haven. And I think I sent him back, like, probably an offensive emoji or  
8 something like that.

9           Mr. Wellborn. I think you're referring to Winter Palace.

10          The Witness. Winter Palace, whatever it was, Winter Palace, the Winter Palace.  
11 And I didn't know what the Winter Palace meant. In that moment, I had no idea.

12          But, again, he plays so much stuff close to his chest. He always says weird things.  
13 Like, whenever we'd hang up the phone, he'd say QSL. I'm like, who says that?

14          So he said that to me in that message. And I was, like, I didn't -- at this time I  
15 didn't really pay attention. And then when the FBI showed me the -- that message and  
16 the document, they pointed out that it was the Winter Palace, it was called on there.

17          That's the only thing really that stuck out because I could see where they were  
18 trying to make a connection here. I had no idea what the Winter Palace meant.

19          Q And Winter Palace was code for what?

20          A I believe the Capitol.

21          Q The Capitol. Okay. The Capitol Building?

22          A From what I remember in the document, reading it for 20 seconds while I  
23 was here, yeah.

24          Q And so you had messaged Tarrio on the 6th just kind of expressing disbelief  
25 at what happened, and Tarrio's response was just Winter Palace?

1           A    The Winter Palace, yes.

2           Q    The Winter Palace.   Why would that mean anything to you if --

3           A    Again, he does stuff like that.   And after thinking about it, I think that it  
4 possibly could have been a way to later on, if it was successful, say, see, I knew about it,  
5 or you know what I mean -- or without saying he knew about something happening.

6                If it was successful, then he could claim credit.   If it wasn't, it meant nothing.  
7 You know what I mean?   That never came out.

8                So that's kind of the way I think.   I'm thinking -- that's my own -- probably my  
9 own opinion about how.   I am not inside his head to know.

10               BY [REDACTED]:

11          Q    Mr. Bertino?

12          A    Yes.

13          Q    Did you ever hear Winter Palace being referenced in -- well, the Winter  
14 Palace was where the Russian emperor used to live.   So I'm curious whether there was a  
15 connection there, and if you heard anyone talking about that?

16          A    I did not.   The first thing time I ever -- like I don't even remember from the  
17 actual conversation on the 6th with him.   But the first time that I remember seeing it  
18 again was when the FBI showed me that.   But, no, I had no idea what the Winter Palace  
19 meant.

20          Q    Got it.   Did anyone ever use the term "Bloody Sunday"?   Does that ring a  
21 bell?

22          A    Not off the top of my head, no.   Other than from that song, the U2 song,  
23 that's the only thing I can think of that I would have ever heard "Bloody Sunday" from.

24          Q    Sure.   I'm asking because the Winter Palace is associated with an event  
25 called Bloody Sunday that happened in 1905.

1           A    Okay.  No, I have not heard that, those two used together.

2           Q    Got it.  No worries.  Thank you.

3           A    Uh-huh.

4                BY [REDACTED]:

5           Q    Okay.  There's been some reporting on the "1776 Returns" document, and  
6   some of that reporting has indicated that the document might have come from a  
7   girlfriend of Tarrio's at the time.

8           A    Uh-huh.

9           Q    I know you said that he was involved with a couple different women or  
10   multiple women at the time.

11          A    I couldn't even begin to tell you.

12          Q    Do you remember any individuals that were -- well, first of all, do you  
13   remember the names of any of those girlfriends?

14          A    Tara was one.

15          Q    No -- don't recall a last name?

16          A    It was a Polish last name, Cherminsky (ph) or something.  She had a  
17   YouTube channel.  She was a reporter.

18                I can't remember the other one's name.  He had little nicknames and stuff for  
19   them so we could talk -- he could explain them when they'd come around.  But, no,  
20   that's -- I don't remember any other names of any, no.

21          Q    Tara is the only one.  Okay.

22                Do you remember were any of them particularly interested or involved in sort of  
23   the similar ideological issues or interested in January 6th and the idea of being present  
24   and making a statement on the 6th?

25          A    Probably all of them.  I mean, I don't think he would have dated anybody

1       that wasn't, like, didn't feel the way he felt about stuff.

2               Q     Whether or not you remember any of their names, did any of them stand  
3       out to you as -- I mean, I guess what I'm saying is, knowing that the "1776 Returns"  
4       document may or may not have been shared with Mr. Tarrio by a girlfriend, is there one  
5       that stands out in your mind or a couple that would be potential kind of authors or  
6       people who were disseminating this document?

7               A     I guess the only -- I mean, that would be speculative for me to say. I mean,  
8       I don't know how -- I knew two of them. There's probably 40 that he dealt with. So I  
9       don't want to -- he probably had 40 women he talked to on a regular basis.

10              Q     Okay.

11              A     Yeah. I mean, it could have come from anywhere. I mean, if you have a  
12       name where it might have come from and you can obviously say, I'll let you know if I  
13       know that person. But, I mean, yeah, as far as guessing which one it would have come  
14       from, I wouldn't feel comfortable doing that anyway.

15              Q     Okay. You said that you knew two of them. I think you've named one.  
16       Do you who was the other one that you're thinking of?

17              A     I can't remember. She was Canadian, though. So I don't think that would  
18       have -- I don't think that that would have -- I don't think that that type of document  
19       would have come from her.

1

2 [4:00 p.m.]

3 BY [REDACTED]:

4 Q Okay.

5 A Yeah. I don't remember her actual name though, to be honest with you.  
6 It's been a while since I talked to any of them.

7 Q And then, since you were shown the document, have you talked to anybody  
8 else or learned any new information about the document? I take -- or I've kind of heard  
9 from you, I think, that you were surprised by the document. It kind of stood out in your  
10 mind, and --

11 A Oh, yeah.

12 Q -- it was something that led you to believe that Tarrio had not disclosed  
13 some things to you. So I'm curious, did you then sort of engage in sort of your own  
14 investigation or talk to anybody about the document afterwards?

15 A No, I haven't been in contact with anybody from that -- from the Proud Boys  
16 or anything else since, and so anything that I'm -- I've read on it I've read on the news  
17 sources or whatever.

18 Q Okay.

19 Mr. Wellborn. And to interject, he was specifically instructed at the close of the  
20 debrief to not have any conversations with anyone about what went on in the room  
21 during the debrief.

22 [REDACTED] Okay. Sorry, can you repeat that --

23 The Witness. That's why I had to keep stopping and asking him if it was okay to  
24 tell -- explain it to you guys or not.

25 [REDACTED] Yeah, no, I understand that. And sorry, could you repeat that one



1 more time, Mr. Wellborn? I lost you for a second.

2 Mr. Wellborn. Yes. Yeah. Mr. Bertino was specifically admonished both by  
3 U.S. attorney and also by Federal agents to not discuss anything that had taken place  
4 during the debrief. And it was, of course, during the debrief that he was shown for the  
5 first time that discrete page from the 1776 Returns and was getting acquainted with the  
6 term "winter palace," although obviously his sort of understanding and, shall we say,  
7 familiarity with late -- or early 19th century, excuse me, 20th century Russian history is  
8 somewhat diminished.

9 [REDACTED] Understood.

10 BY [REDACTED]:

11 Q Okay. Let's kind of zoom out then a little bit. I'm going to ask you a  
12 couple kind of high-level questions, and then we can take a break. And I think -- well, let  
13 me ask, what -- if we've got, I'm going to guess like about another hour or so, do you guys  
14 have any scheduling issues with that, or is -- an hour will be okay?

15 Mr. Wellborn. I think we're good for another hour. A break would be good,  
16 because I think we've been going for, what, just over two?

17 [REDACTED] Yeah. So let's take a break now. Let's come back at 4:15, and  
18 then we'll try to be done by about 5:15.

19 Mr. Wellborn. Sounds good.

20 The Witness. Okay.

21 [Recess.]

22 BY [REDACTED]:

23 Q We're back on the record at 4:15.

24 Okay. I wanted to step back a little bit, and just, in general, leading into  
25 January 6th, what was your understanding of what the Proud Boys planned to do on the

1 6th?

2 A Okay. So this goes back to the creation of the MOSD, and the MOSD was  
3 supposed to be a small group of guys who were supposed to go in, just a few chosen  
4 guys. They were supposed to go in, and originally they were supposed to escort  
5 whoever was speaking from stage to stage. That was the last plan that was laid out for  
6 everyone to know: Hey, this is what's going on.

7 Supposed to escort whoever, whether it would be me or Enrique or anybody else,  
8 supposed to escort them from stage to stage just to make sure, you know, that nobody  
9 got hurt, you know, especially if I was there. So that was the plan leading up to the 6th.

10 Q And that was only for -- and that was only for speakers that were Proud  
11 Boys, you mean, so like Tarrio and potentially you?

12 A Yes. Yes.

13 Q Okay.

14 A Yeah. The idea was a small group of guys, we could be, you know,  
15 indiscriminate, and they could get -- like it wouldn't bring any attention to what I was or  
16 who Enrique was so that they could get them from point A to point B to do their speaking  
17 or whatever, because apparently Enrique was supposed to speak on stage at a few  
18 different places. I guess there was like three or four stages that were set up.

19 So the original plan that he told us was that he was going to be speaking at a few  
20 stages and that he -- that group would just go as like a small security thing just to make  
21 sure that, you know, they weren't attacked or anything like that. And then --

22 Q Okay.

23 A -- that's where "don't wear colors" came in.

24 Q Okay. Just another quick question, and maybe this is an obvious question,  
25 but who were you worried was going to or were going to be attacking you on the 6th or

1 was the threat on the 6th?

2 A Probably antifa. That was always -- you know, that was always -- black bloc  
3 specifically was always kind of the ones who we always knew that they were the threat  
4 whenever we went anywhere.

5 BY [REDACTED]:

6 Q So, Mr. Bertino, not to put too fine of a point on it, but it's fair to say that  
7 you were expecting antifa to be there on January 6th. Is that right?

8 A I would say, yeah, anytime that we went anywhere, especially in D.C., that  
9 we knew that there would be an antifa presence there, yes.

10 Q Got it. Black Lives Matter as well?

11 A Yeah, I think they were all -- they all kind of ran in the same circle, so it was  
12 always them together, you know. I mean, I don't know that they were one -- I think they  
13 were one in the same pretty much, the groups.

14 Q Got it. And I understand that antifa tends to wear black when they go out.  
15 Is there -- are there other ways that you identify antifa or their associates at events?

16 A Unless we know them specifically by name and by face, you could  
17 just -- usually they would let you know who they were by -- they would start yelling things  
18 at you, and if they got -- decided to get violent, they would throw things at you, try to  
19 assault you, something like that, spit on you, throw human feces on us. I've had that  
20 happen. I've had human -- I've had urine and human feces thrown on me, so --

21 Q Got it. That's very helpful.

22 A So if I found that -- if I saw a guy in the crowd throwing a poop bomb at me, I  
23 could assume that he was antifa.

24 Q Fair enough. Thank you.

25 A You're welcome.

1 BY [REDACTED]:

2 Q And then, so you mentioned that the -- that the dressing in all black was to  
3 go kind of incognito. Was it also at some point or was it discussed that the goal in  
4 wearing all black was to look like antifa?

5 A Yes, that was -- that was another thing. I think that's -- I don't know if  
6 that's the reason why, to look like antifa. I think it was more to -- we -- like we came up  
7 with that -- came up the way that like: Hey, we can go -- if we're not dressed in our  
8 colors, antifa won't attack -- won't zero in and target us like they always do.

9 Then I don't -- I don't remember if it was Biggs or if Enrique decided, they were  
10 like: Hey, let's put out a post telling antifa we're going to dress in all black and dress like  
11 them and just troll them and mess with them, and then maybe they'll -- you know, they  
12 won't have a physical target, and they'll be more worried about us being in the crowd or  
13 the guys there -- when I say "us," I mean the guys that are there -- being in the crowd and  
14 they not knowing -- without knowing who they are so they won't have a target and  
15 maybe they'll just stay away. So that's originally why that idea came up, because if you  
16 dressed in the black and yellow, you were a target every time. They knew right where  
17 to go for you.

18 Q Okay. So I think you were explaining the plan was to escort speakers --

19 A Yes.

20 Q -- particularly Mr. Tarrio and potentially you.

21 A Uh-huh.

22 Q And how did that change, or did that change?

23 A Yeah. Well, I mean, obviously, with my presence not being there, I believe  
24 it was -- they were just supposed to go to -- if Enrique was still speaking, then they were  
25 supposed to just escort with him to the stage. And anybody else that went that was a

1 Proud Boy wasn't supposed to go as a Proud Boy, you know. Basically, if you weren't  
2 there with that group, then you weren't there as a Proud Boy, because you weren't going  
3 to be able to be reined in to keep from doing anything stupid or illegal.

4 And that was the idea -- the sole idea of MOSD was to keep us -- keep guys safe  
5 from getting stabbed, shot, attacked, and keep -- you know, if we could keep control over  
6 guys and learn how to keep control of them in a smaller group, maybe we could do it in a  
7 larger group someday where we could keep guys from running off and going to get in a  
8 fight and getting arrested and making the club look bad.

9 So that's the -- that's the idea and that's what I was sold on the MOSD as. We  
10 even signed documents, everyone that joined the group. So I don't know if you guys are  
11 aware of it, if you've seen it, but we've all signed -- we all signed documents stating that  
12 they wouldn't break the law, they wouldn't -- they wouldn't commit violent acts, they  
13 wouldn't attack anybody, they wouldn't assault anybody, and they would listen to  
14 leadership when they told them, hey, you've got to come back here, don't go do  
15 something stupid.

16 Q And --

17 A And literally that's --

18 Q -- when did you sign those documents?

19 A It was in between when the -- I think it was before you could even get into  
20 the MOSD chat, we had to sign those documents, and they were all signed and sent back  
21 to Enrique. He should have every single one of them.

22 Q That's what I was going to -- that's what I was going to ask. So Enrique  
23 collected the signed documents?

24 A Yes, sir.

25 Q Okay.

1           A    He should have all those documents in his emails, probably his  
2   FundTheWest@Gmail, I believe, is where we send them all.

3           Q    Can you -- fun or fund?

4           A    Fund, F-u-n-d, thewest@gmail.com was the email address.

5           Q    Okay. I want to ask, let's -- well, so, you've discussed some of the purposes  
6   and safety kind of issue in keeping control of the members. In a second I want to direct  
7   your attention to some of the excerpts from the MOSD chats in the indictment, but we  
8   can kind of talk about them generally first.

9           A    Sure.

10          Q    And there are certainly excerpts that talk about storming the Capitol Building  
11   and the Capitol being a focus and entering the Capitol. Do you recall those chats, and  
12   what's your kind of response to those having been discussed in the chat? Was there  
13   also a discussion of either approaching the Capitol Building or entering the Capitol  
14   Building or any buildings around it?

15          A    Pre -- pre-breach, no, I don't believe there was that I can -- that I can recall.  
16   I had never for a second thought or read anything that led me to believe that any of those  
17   guys were planning to do anything like that.

18          Q    Let's -- and I just want to -- I just want to look at these just, again, to kind of  
19   get your reaction and see if it jogs your memory.

20          A    Yes.

21          Q    Have you read the indictment before? Have you read whole thing?

22          A    I've read pieces of it, but I have not gone through the whole thing, no.

23          Q    Okay. Well, let's pull up exhibit 6 -- or, sorry, 7 again. And then we'll look  
24   at paragraph 48. And, actually, we'll zoom in on 48. I'll let you read that, and then  
25   we'll have -- we'll scroll to the next page, page 14, and have you read paragraph 49 and

1 50 also.

2 A Okay.

3 Q Also do -- while we're on 48, we've already identified you as person 1. Are  
4 you aware of who person 2 and person 3 are?

5 A I don't. I don't know who was who on that.

6 Q Do you know -- do you know John Stewart? He also goes by Black Beard.

7 A Yes, I know who Black Beard is.

8 Q Okay. How do you know him or how -- where have you met him?

9 A I met him in D.C. I believe the night I was stabbed is probably the first time  
10 I met him. It might have been the 14th, but I can't remember if he was there for that or  
11 not.

12 Q Okay. And do you know his role in the Proud Boys, where -- what's -- is he  
13 chapter president, or --

14 A I don't know specifically what his -- what his role is. I may have been aware  
15 at some point, but it's -- it eludes me at this point. I don't remember.

16 Q Okay. So then, just for purposes of reading through this, I'll represent to  
17 you that we understand person 3 to be John Stewart, and then there's also a person 2.  
18 Do you know Aaron Whallon Wolkind?

19 A I know Aaron, yeah. I didn't know that was his last name, but yes.

20 Q Okay. And so that is who we understand to be person 2. Where -- where  
21 did you meet Aaron, or have you met Aaron?

22 A I believe the first time I met Aaron was in Las Vegas back in 2019 or 2020. I  
23 can't remember which one it was.

24 Q Okay. And then was he at the November or December rallies?

25 A I think he was at one of them. Again, this is, you know, almost 2 years ago,

1       so I don't specifically recall, but I think he was at one or -- either -- he might have been at  
2       one of those.

3               Q     Okay. All right. Well, then, just focusing back on the indictment in this  
4       exhibit 7 that we have up, so person 3, Mr. John Stewart, says: What would they do if 1  
5       million patriots stormed and took the Capitol Building? Shoot into the crowd? I think  
6       not. They would do nothing because they can do nothing.

7               And then let's scroll down to the next page, paragraphs 49 and 50, and I'll give you  
8       a second to read those as well.

9               A     Okay.

10              Q     And so I'll just point out, and I think you're aware, and correct me if any of  
11       this sounds wrong based on what you know, but in this paragraph 49, Mr. Stewart says  
12       again -- or, again, references the Capitol, and he says that the main operating theater  
13       should be out in front of the House of Representatives. It should be out in front of the  
14       Capitol Building. That's where the vote is taking place and all the objections. Ignore  
15       the stage, et cetera, et cetera, et cetera. He focuses on the Mall.

16              And so I'll note that the Proud Boys on that day started at the Washington  
17       Monument at about 10 o'clock, marched down the Mall, took a route around the Capitol  
18       Building from the side that faces the Washington Monument to the east side of the  
19       Capitol and then back to the west side on the same side as the Mall, and essentially  
20       exactly what's described here in paragraphs 48, 49, and 50 is what ended up occurring.

21              A     Okay.

22              Q     So I guess, one question is, do -- do you just not recall these messages or  
23       mentions of the Capitol?

24              A     Yeah, I don't. I mean, you're talking -- there's -- I don't know how many  
25       messages were in that chat, but there are thousands at all times. So when you get in -- I



1 don't know if you've been on Telegram or if you're on or you understand how it works  
2 when you're in a group chat. You can go in, and it will say there's 300 new messages.  
3 You open up that chat, and you can tap a button and it just scrolls you right to the  
4 bottom.

5 Q Right.

6 A So, even though it's in there, I may not have read it. I don't remember it.  
7 I may have read it. I don't -- but, again, I don't recall reading it. There's, you know,  
8 100 -- 100,000 messages on my Telegram at all times, so if I took the time to read or listen  
9 to everything, especially voice -- voice notes take too long. I read faster than they can  
10 talk, so a lot of time voice notes I don't listen to.

11 Q Right. Okay. So then you -- then by your recollection of all the MOSD  
12 chats that you were a part of, do you remember any of them mentioning the Capitol  
13 Building or approaching it or using that as a focal point for your activities that day?

14 A I do not, honestly, remember, no. I don't -- it depends on how -- you know,  
15 if it was mentioned once or twice, it would probably be easy to miss it. If it was a  
16 constant topic of discussion, like all the time I kept hearing about Capitol, Capitol, Capitol,  
17 then, yeah, I would've seen it. But, I mean, if it's just a, you know, quick note, you know,  
18 to do something then, you know, I could've very easily missed it, and I believe I did. I  
19 don't remember hearing or reading any of that.

20 Q Okay. And then I want to ask just about a post that you made on the night  
21 of the 6th. It's a video message. And if we can pull up exhibit 35. And let's just make  
22 sure the audio is turned up before we start this. [REDACTED], pause it real quick.

23 First, I just want to ask, do you recognize this video, and do you remember this  
24 post?

25 A I recognize the video. I don't recall everything I said in the -- in the rant, so

1 I don't -- I can't be 100 percent, but I do recognize the video.

2 Q Okay. And we'll listen to it and so you can remember what you said.

3 A Okay.

4 Q But this was posted on the night of the 6th, I believe. Is that right?

5 A I -- I -- I think so. Again --

6 Q Yeah.

7 A -- I don't remember what day I did it. It might have been that day or the  
8 day after. I don't remember.

9 Q Yeah, and I think you'll tell from the content of what you say that it was on  
10 the same day. So let's just start at 35 seconds if you can, [REDACTED].

11 [Video shown.]

12 The Witness. I can't hear it.

13 [REDACTED] I think you're going -- let's pause it and can you turn the volume up,  
14 [REDACTED]? See if you can hear it now.

15 [REDACTED] You may need to stop sharing and reshare and make sure that  
16 computer audio is selected.

17 The Witness. No audio. Check the volume, I guess, maybe.

18 [REDACTED] The other thing that we could do, Mr. Wellborn, do you have the -- I  
19 had sent you the link with the exhibits.

20 Mr. Wellborn. Yeah. Yeah, let me see if I can draw that up.

21 BY [REDACTED]:

22 Q And then, just while you're pulling that up, Mr. Bertino, just on the topic of  
23 Mr. Tarrio's girlfriends around that time, did -- were you familiar with a girlfriend named  
24 Suraya Foss (ph)?

25 A I did not know about her until he was going to jail. I guess she escort -- she

1 took him up to D.C. I didn't know who she was. I don't -- I don't remember meeting  
2 her. I didn't know if it was his girlfriend. I didn't know he was seeing her or any of that  
3 until then. She -- he gave her my phone number when he went to jail, and she called me  
4 a bunch of times and texted me, and, yeah, so that's the first I learned of her.

5 Q Okay.

6 Mr. Wellborn. So, [REDACTED], I've got the video up. Do you want me to start at  
7 35 minutes?

8 [REDACTED]. Yeah. Let's see, we might --

9 [REDACTED] Why don't we -- do you want to try this?

10 [REDACTED] Yeah, we might have just figured out how to share it from ours.

11 Mr. Wellborn. All right.

12 [Video shown.]

13 [REDACTED]. Does that audio work?

14 [REDACTED]. Yes.

15 Mr. Wellborn. Yep.

16 [REDACTED] Yeah, let's go to 35.

17 [REDACTED] I can't see where the tracker is, but --

18 [REDACTED] We can start from the beginning if we need to.

19 [REDACTED] Okay.

20 [Video shown.]

21 BY [REDACTED]:

22 Q Okay. You can pause it there. I just want to -- can you still -- can you hear  
23 the reverberation that I can hear?

24 A No, it's gone now.

25 Q Okay. I just want to focus on the portion of your statement about talking

1 about the rioters, and you say they were coming in to storm the floor. And I just want  
2 to understand what you meant there and that -- just explain that statement to me first if  
3 you can.

4 A I guess the -- I guess, from the information I had at the time -- obviously that  
5 was right after. Not a lot of stuff -- I hadn't seen the video clip. I hadn't seen any of  
6 that stuff. What I had mostly seen at that point led me to believe that, you know,  
7 obviously -- and obviously, at that point, I knew that -- I didn't know about a plan that,  
8 you know, anybody may have had.

9 But it just wasn't like those people and the Trump supporters, like I didn't see or  
10 think that those type of people -- that they were in there to hurt anybody or do any  
11 violence. Like my thought process on that comment was I think they were trying to go  
12 in there and go sit down on the floor, lock arms or something like that, I don't know, but  
13 just nothing violent.

14 I didn't think that -- you know, I've been to plenty of rallies around these people  
15 plenty of times. I had never really seen them initiate violence or go after police. The  
16 first inkling I ever had that they wanted to breakthrough a police line and they were  
17 disrespecting police was December 12th when I stopped everybody and turned them  
18 around. I just didn't see them, you know, from at that point, from my view, as looking  
19 to go in and do anything violent.

20 I thought at that point they were going in, maybe some yelling on the floor at the  
21 representatives to stop and whatever, but I -- you know, I think at that point I just was full  
22 of emotions when I did that. I was angry that they made -- you know, like if there was a  
23 chance that they could've objected, they ruined it by going in and doing what they did.  
24 It was stupid. And so that was my thought process on the whole thing.

25 Q Do -- having obviously seen more reporting and coverage of what happened

1 on the 6th, do you have different feelings at this point about what transpired as far as  
2 violence towards police officers and just violence in general on that day?

3 A Yeah, I believe that there were bad actors that hyped up the crowd. And  
4 I've been in those crowds before, and they're easily whipped into a frenzy. I don't know  
5 who the bad actors all were. I don't believe it was just, you know, a certain group of  
6 people. I think there was a lot of people. You get a hundred people standing around  
7 and one guy just starts, you know, trying to whip everybody into a frenzy, he can do it.

8 So, yeah, I don't -- I don't -- I think the entire thing was stupid. I think it was the  
9 dumbest thing that they could've done. It made them all look like the people that, you  
10 know, the media had -- that they'd been arguing with the media that they weren't for  
11 years, so I think it was dumb. I think it was -- you know, in retrospect, it's probably the  
12 stupidest thing that I've ever witnessed in this country.

13 Q When you say that there was a couple bad actors that whipped up the  
14 crowd, do you put some of the Proud Boys in that group of folks that whipped up the  
15 crowd and were bad actors on that day?

16 A It could possibly, but I didn't see -- you know, I don't see -- I haven't seen all  
17 of the videos. Like if -- so you know what I mean, like I can't be a -- I want to be  
18 objective when I say that. Is it possible? Absolutely.  
19 Did Pezzano -- Pezzano -- Pezzola?

20 Q Pezzola?

21 A Pezzola. Did he go smash the window? Absolutely, there's no denying  
22 that. Was that incredibly stupid? Absolutely. And I think he even knows that it was  
23 incredibly stupid at this point. Yeah, but I don't -- there was other people there that  
24 weren't Proud Boys that were probably whipping up the crowd too, so.

25 You know, and when it's all -- when it all comes out in the wash and we

1     decide -- we figure out, you know, you guys finish your investigation and figure out what  
2     happened, you know, hopefully -- hopefully everyone can learn from it. But, you know,  
3     there's always -- there's always bad eggs in the -- you know, in a dozen, bad apples in a  
4     bunch, so --

5             Q     Understood. Well, then, I guess, recognizing that you didn't see some of  
6     these messages that we just looked at in the indictment, recognizing that those three  
7     paragraphs that we just looked at do, in fact, sort of track what the Proud Boys did on  
8     that day and also knowing what ended up occurring and what the results of that day  
9     were, do you now feel like you weren't aware of this plan that did exist among some  
10    people that were in the chats, or what's your opinion on that?

11            A     Yeah. I feel like -- you know, one of the messages I did read in the  
12    indictment was where it said plans would be laid out on the grounds that day when  
13    everyone met at the Washington Monument. I don't know if you're aware. I'm sure  
14    you read the indictment. That part where it said plans would be laid out on the  
15    grounds, yeah, I believe that either they made the plan right then and there on the  
16    grounds and decided this is what they were going to do, or if Tarrio had somebody in  
17    there that said: Hey, this is -- this is what we're going to do. Wait until everybody gets  
18    there and pass the message so I won't -- since I can't be there.

19            I can't tell you which one. I'm speculating on both, but judging by the fact they  
20    said "plans will be laid out on the ground" and watching, you know, what little video clips  
21    I can actually see and make out who was who, then, yeah, I think they probably may have  
22    made a plan right there to go in there and do it. And, you know, I definitely was not  
23    aware of it, and I'm definitely pissed off about it, you know. Excuse my French, but I'm  
24    pissed off.

25            Q     I want to then ask, so I know, leading into the 6th, you were a little bit out of

1 it, I guess, and you have some fuzzy memory. But according -- we have some of the  
2 MOSD chats and we can look at some of them and then also piecing together with the  
3 indictment, and I'll -- and I can pull it up again or it might just be easier for me to read this  
4 portion to you.

5 But paragraph 55 of the indictment says that on January 5th, person 1 created a  
6 new encrypted messaging group entitled Boots on the Ground to be used by Proud Boys  
7 members in Washington, D.C. So then I take it that, you know, even though you weren't  
8 there on the day or the day before and you were a little bit out of it, you were actively  
9 creating group chats of Proud Boys that were there, right, so you were -- you were kind of  
10 involved in those days remotely?

11 A Yes.

12 Q Okay. And what -- what was your -- what was your intention there?  
13 What did you plan to have happen, and what were the messages that were supposed to  
14 be sent to the group, the Boots on the Ground group on that day?

15 A So my intention of doing that, somebody asked me: Hey, can you start a  
16 chat where you can get everyone that's there, whether they're MOSD or not, get  
17 everybody there into one? Because this all happened after Enrique was arrested. The  
18 guys went and nuked all the chats and deleted them all, and everyone was running  
19 around with their heads chopped off.

20 And the last thing I wanted to have happen was chaos, chaos, because chaos  
21 in -- without having leadership, that's exactly what got me stabbed, what got guys  
22 arrested, you know what I mean, and did -- and it leads to bad things without having  
23 some sort of organization and leadership.

24 So I created the group for everyone to -- you know, that was there so that they  
25 could communicate to what was going on on the ground, like where Enrique was. If you

1 go and read some of the chats in there, a lot of it was focused on finding which facility  
2 Enrique was in, when is he getting out, you know. Now the plan, you know, whatever  
3 plan Enrique might have had, we don't know, so we've got to make a new plan, decide  
4 what, you know, who's going where, what are we doing.

5 It was basically to organize the guys on the ground so that we didn't have -- you  
6 know, trying to herd the cats, so we didn't have just guys running all over the place doing  
7 whatever they wanted because that always leads to trouble. And so my reasoning for  
8 creating that group was to get everyone back together so there was no mayhem, there  
9 was no chaos, everyone could calm down and, you know, be safe. I wanted to make  
10 sure everyone stayed safe, stayed alive, and stayed out of jail. I didn't want anybody to  
11 do anything stupid to get arrested.

12 Q Okay. Did -- let's go through a little bit -- or let's not go through the whole  
13 day, but I want to understand your evolution of your perception of what was going on  
14 and what was being planned on the day of. So, obviously, at some point during the day  
15 as you're watching from home, you realize that people are entering the Capitol and some  
16 of those initial people are Proud Boys. Did you see Pezzola smashing in the window on  
17 the news, or when did you first learn that he had done that?

18 A I don't -- honestly, I don't recall when I first saw it. I didn't see it live. I  
19 didn't see him smashing it live, like I think it was on BG On The Scene's feed, if I  
20 remember correctly. I'd seen the video 1,000 times, and I wish I didn't have to see it.  
21 But, yeah, I don't remember -- I don't recall specific -- I'm going to tell you right now like  
22 my memory of that day and the events as they transpired and timelines is very shot. I  
23 was in a lot of pain that day. That's part of my aggravation in the video and the anger  
24 that you saw in my video is I was in a lot of pain. I don't know if you've ever had major  
25 surgery like that or had to deal with anything like that. I was in a lot of pain, and even



1 my girlfriend had said: You were very, very -- in a lot of pain. You were angry, you  
2 know. You were dealing with PTSD plus the opioids.

3 I don't recall every bit of what I saw when I saw it, so I -- you know, I can't answer  
4 that directly and say I saw it at 10 -- at 2:27. I don't remember.

5 Q Okay. Let's focus on a slightly different kind of issue on that day. And we  
6 talked about earlier the marching and how Mr. Tarrio was pretty focused on the need for  
7 Proud Boys to march in a line, and I take it that that's related to this idea of organization  
8 on the day and keeping everybody kind of together. Is that --

9 A I -- I'd have to -- I guess I'd have to see what you're talking about with him  
10 trying to push for everyone to be organized. Do you have something that you can show  
11 me on that? Because --

12 Q Yeah, sure.

13 A -- Enrique's never been the guy that's like: Hey, everybody get in line and  
14 do -- you know, he's never been that guy. He's kind of a fly-by-the-seat-of-his-pants  
15 type of leader, you know what I mean. Like --

16 Q Yeah.

17 A So, when you say that, it actually kind of surprises me that he would say  
18 something like that.

19 Q Yeah. Let's look at exhibit 13. This is another video, and this is from the  
20 night of the 6th. Mr. Tarrio's in Baltimore at a hotel room. And if you could just give  
21 us a second to pull it up.

22 [REDACTED], are you there? Oh, there you go. Cool.

23 [REDACTED]. Do you want to start right at the beginning?

24 [REDACTED] Yeah, let's start at the beginning.

25 [REDACTED]. And just a word of caution, I think the audio is just low on this

1 video in particular.

2 [Video shown.]

3 BY [REDACTED]:

4 Q Okay. We can -- yeah, we can end it.

5 A I specifically don't remember him grilling anybody about marching in line. I  
6 think what he was referring to was keeping -- because this was one of the big things that  
7 always came up was people getting in the ranks, especially females getting in the ranks,  
8 and then we -- they would -- we would then have to focus on keeping them, you know, or  
9 anybody out of -- out of the ranks. In case we were attacked, we didn't want women  
10 there as targets.

11 So people getting into the ranks was always a security issue, you know. Anybody  
12 could just walk in with a knife and just start stabbing people that were, you know, walking  
13 in that formation, so -- but, yeah, I -- I don't remember him drilling hard about that.

14 Q Okay. Do you know -- he mentions a 2-hour video chat. It sounds like it  
15 happened shortly before the 6th.

16 A Uh-huh.

17 Q Do you recall a long video chat --

18 A Oh, yeah. Yeah.

19 Q -- before the 6th?

20 A He has that. He has that video somewhere. He has it saved.

21 Q Okay. And what -- what do you recall from that meeting, or what was  
22 being discussed there?

23 A I don't remember the specifics, but I do remember the -- being in a meeting,  
24 being there. It was basically about what is expected of you if you were going to stay -- if  
25 you were going to be part of that MOSD, you were expected to, you know, not break the

1 law, keep it -- keep each other safe, you know, look out for your brother and make sure  
2 he's not doing anything stupid, if you see somebody doing something stupid, bringing  
3 them back in. You know, that was -- that was -- obviously that was the whole idea and  
4 the whole premise behind the MOSD. So I think that's what he mainly tried to hit home  
5 in that -- in that video chat.

6 Q Okay. And then there's -- Amy Harris mentions an experiment in that video  
7 clip. She says: I didn't tell him about the experiment.

8 Do you know anything about that or what that means?

9 A I don't. I have no idea. That might have been a little inside thing with  
10 him.

11 Q All right. And then let's -- so let's talk about Mr. Tarrío's reaction to you. I  
12 know you mentioned that, in your meeting with the FBI and DOJ, that they showed you  
13 some messages from Mr. Tarrío where he makes reference to the winter palace.

14 A Uh-huh.

15 Q What were your conversations like with Mr. Tarrío at -- well, one, as the  
16 events are going on and then, two, that evening?

17 A I think that was really -- that was really all we talked about. He was  
18 obviously -- I think I called him on the phone short -- for about -- the phone call probably  
19 lasted about a minute or two, if that much, because he had a million things going on. I  
20 called him, and I said: Holy shit. I can't believe this is happening.

21 And him responding with: I know, man, this is crazy -- or something -- you know,  
22 something along those lines. But it was a very brief phone conversation, if I remember  
23 correctly. But that was about it that I can remember that day. I didn't talk to him  
24 much that day that I could -- I can recall.

25 Q Okay. So we -- we have -- so we do have some of the MOSD chats, and I

1 want to show you a couple of them and ask about some different messages and some  
2 folks that are in those messages.

3 A Okay.

4 Q So the first thing I actually want to do is go through and see if you can  
5 identify some individuals for me. I know some folks you just know by username. But if  
6 we can pull up exhibit 17 and let's go to page 11. And if you can zoom in and scroll  
7 down little bit, yep. Right there is good.

8 Okay. I first want to ask you about this -- there's one message from an individual  
9 named Dr. Leo Oberfuhrer, and he says: Haha, us Philly guys, pray for it.

10 So it sounds like he's from Philly. Do you know who that is?

11 A Not of that name, no.

12 Q Okay. I noticed you laughed when I said the name. I just wonder what  
13 the --

14 A Just -- it's just the names they come up with are just completely dumb.  
15 Yeah, I have never seen that name before. That's why I was kind of like, what?

16 [REDACTED] What does Oberfuhrer mean?

17 The Witness. I have no idea. I have no idea.

18 Mr. Wellborn. How is your German?

19 The Witness. Terrible.

20 Mr. Wellborn. That would explain it.

21 The Witness. I just hear -- yeah, just the names are just dumb.

22 [REDACTED] Got it. Well, Oberfuhrer was a high rank in the Nazi party.

23 The Witness. Oh, okay.

24 [REDACTED] They were people who ran paramilitaries.

25 The Witness. Gotcha. Okay.

1           Mr. Wellborn.   Actually, it's just a term in German that means above or higher  
2 leader.   Fuhrer simply means leader in German.   Ober means above as opposed to  
3 unter.

4           [REDACTED]   Well, Mr. Wellborn --

5           [REDACTED]   Yeah, it's a rank.

6           [REDACTED]   -- Oberfuhrer, it's a specific rank.

7           Mr. Wellborn.   I understand it was a rank in the SA, but I'm just giving him the  
8 direct translation.

9           [REDACTED]   Sure.   I mean, if you want to --

10          Mr. Wellborn.   Apparently, whoever this guy is has enough --

11          [REDACTED]   Mr. Wellborn, I'm sorry to interrupt, if you want to dispute why  
12 the user chose the word "Oberfuhrer" to identify themselves, you're free to do that.  
13 But I just want for the record --

14          Mr. Wellborn.   I have no idea why this person chose the name.   I'm simply  
15 giving my client a direct translation of the word.

16          [REDACTED]   Well, maybe in the context of another username within MOSD  
17 Turbokike, that might add some context to the fact that one user was named Oberfuhrer  
18 and another user was named Turbokike.   Does that ring a bell?

19          The Witness.   No.

20          BY [REDACTED]:

21          Q   I'm going to -- so you don't know who either Oberfuhrer or Turbokike are?

22          A   I do not -- I don't recognize those screen names, no.

23          Q   Okay.   I've got some other screen names --

24          BY [REDACTED]:

25          Q   I'm sorry, what does Turbokike mean?

1 A I -- well, I know what kike means.

2 Q And what does that mean?

3 A A kike is a, I guess, a derogatory term for a Jewish person.

4 Q Got it.

5 A But I think -- from judging from Proud Boy lore and from being around the  
6 club long enough, this guy is probably Jewish, and that's why he uses that name.

7 Q Why do you think that?

8 A Because generally all the Jewish guys that were in there would use stuff like  
9 that, like Tiny Hat or whatever they decided they wanted to use as their joke name, they  
10 would use that. So I'm judging, based on what I know, that that's -- that guy is probably  
11 Jewish.

12 Q Got it. So they would use --

13 A Self-deprecation jokes. I mean, I -- everybody made fun of themselves and  
14 everyone else in there, so that's probably how that name came up.

15 Q Got it.

16 [REDACTED]. I have a couple other usernames. [REDACTED], did you have any other  
17 questions?

18 [REDACTED]. Go for it.

19 BY [REDACTED]:

20 Q A couple other individuals. Do you know who Twisted Zack is?

21 A Twisted Zack.

22 Q And you can take this -- you can take the exhibit down.

23 A Twisted Zack, I've heard the name but I don't know specifically who he is.

24 Q Okay. The -- and tell me, you know, I know some of these different  
25 usernames use different fonts or anything, so let me know if you think it would be helpful

1 to actually see the message, but there's another --

2 A It might, yeah.

3 Q I can pull up Twisted Zack for you in a second then. There's another  
4 username Dick Sweats?

5 A Dick Sweets.

6 Q Dick Sweets?

7 A Yes. Dick Sweets, yeah.

8 Q Okay. Do you know who that is?

9 A Yeah, Dick -- I think his last name was Sweets.

10 Q Oh, his name is Sweets, okay.

11 A Sweets, yeah. That was his actual name.

12 Q All right. And do you know where --

13 A Philly.

14 Q -- Dick is from?

15 A Philly.

16 Q Philly?

17 A Uh-huh.

18 Q Okay. How about Spanks?

19 A I've seen it, but I don't know who he is.

20 Q Okay. There's a user from Florida, or at least indicated he's in Florida in the  
21 chats, named JBone?

22 A Uh-huh.

23 Q Do you know who that is?

24 A I do know JBone.

25 Q And do you know his actual name?

- 1           A    No, I don't.
- 2           Q    How do you know JBone?
- 3           A    I roomed with him in Portland, shared a hotel room with him in Portland.
- 4           Q    What chapter in Florida is he part of?
- 5           A    I couldn't tell you.
- 6           Q    Is it -- do you know if it was Mr. Tarrio's chapter?
- 7           A    I don't think so, but I -- again, I don't know.   There's like 30 of them down
- 8   there, so --
- 9           Q    There were -- there's a Proud Boy who says that he's from Michigan, Saint
- 10   Xhristopher?
- 11          A    No idea.
- 12          Q    Doesn't ring a bell, okay.
- 13          And then there's an individual -- seems like he has sort of two usernames, it's
- 14   CapCityRob and then in parentheses RONAN in all capitals?
- 15          A    Uh-huh, I know who CapCityRob is.
- 16          Q    Okay.   And who is that?
- 17          A    His name is Rob.
- 18          Q    Okay.   And CapCity being D.C.?
- 19          A    No, I think he's from Michigan too.
- 20          Q    Okay.   How about Brother Jake Phillips?
- 21          A    Brother Hunter Jake Phillips?
- 22          Q    His username is just Brother Jake Phillips.
- 23          A    Yeah, Jake Phillips, yep.
- 24          Q    Okay.   And where is he from?
- 25          A    Ohio, I think.   Yes, Ohio.



1 Q That's right. And his actual name is Jake Phillips?

2 A Yes.

3 Q Hunter Jake Phillips, did you say?

4 A Brother Hunter. They -- he changed his name to Brother Hunter.

5 Q Okay. So Brother Hunter is just his nickname. Jake Phillips is his actual  
6 name?

7 A Yes.

8 Q Okay. And then Redbeard The Original Fourth Degree, have you ever  
9 heard --

10 A There's 17 Red Beards that I've seen, so I don't know which one is which.

11 Q I can -- there's actually a photo of him. If we can pull up exhibit 21 and go  
12 to page 4. And it's that, the one who's pictured there at the bottom.

13 A Hmmm.

14 Q Do you recognize him?

15 A Not particularly, no.

16 Q Okay.

17 A I may have seen him. He may have been in a rally with me before, and I  
18 wouldn't know, but I -- I couldn't tell you right now, 2 years later, who that guy is.

19 Q Okay. Let's see.

20 BY [REDACTED]

21 Q Mr. Bertino, what does the acronym RWDS stand for?

22 A Right Wing Death Squad, I believe it was supposed to be originally, yep.

23 Q Got it. And are you familiar with Augusto Pinochet?

24 A Yep.

25 Q What can you tell me about him?

1           A    He was a general, I believe, in Chile who overthrew a Communist  
2 government and brought capitalism back to Chile back in the late '70s, early '80s.

3           Q    Got it.   So, when you wear a shirt that says "Pinochet did nothing wrong,"  
4 what does that signify?

5           A    It's a troll.

6           Q    Can you explain that?

7           A    It's a troll to get a rise out of all left-wing counterprotesters, as we would  
8 say, I guess.   It's why --

9           Q    I'm not sure I understand.   Can you explain?   Can you explain what you  
10 mean by that?

11          A    What a troll -- like what a troll is?

12          Q    Sure.

13          A    A troll is something that, I guess, if you say it's going to trigger somebody to  
14 get mad, even though -- even if you don't believe it, you're just kind of, you know,  
15 messing around with them, and it's just something outlandish to say to get somebody  
16 to -- like get a reaction out of somebody and get them to go screech and scream at you or  
17 whatever.   So it's originally why, you know, why that shirt was made.   It was to troll  
18 people.

19          Q    Got it.   So is that the reason that you wore that shirt?

20          A    Yes.

21          Q    And what does Right Wing Death Squad mean?

22          A    I mean, it's another troll.   We changed it over the years from Right Wing  
23 Death Squad to Right Wing Dance Squad.   It's been -- it's been -- there's like seven  
24 different -- then there's Right Wing Fun Squad we changed it to.   So there's a whole  
25 bunch of different meanings for it, but, yeah, it's just -- it was -- I don't even know where

1 it originally came from in the club. It was there before I got there, and it was just part of  
2 a shirt that I got sent for free, and then somebody took forever to send me another shirt.

3 Q Got it. So it was intended as humor?

4 A Yes.

5 Q Got it. Do you mind explaining the joke?

6 A Well, I just said, I don't -- I don't -- it was here before I got there. It was  
7 there before I got there.

8 Q Right. But you wore the shirt --

9 A Yes.

10 Q -- so what did you think you were doing?

11 A Well, again, it was a troll. I wore it to a -- I think I wore it to a protest, and  
12 I -- you know, it was basically just to get a rise out of somebody. Was it immature?  
13 Yeah, absolutely. It was basically to get a rise out of somebody, and, you know, that's  
14 all.

15 Q Got it.

16 A That's pretty much it.

17 Q So you were wearing a shirt that said "Pinochet did nothing wrong" and  
18 "Right Wing Death Squad" just for the laughs?

19 A Yeah. At that point, yeah, that's what it was for.

20 Q Got it. Let's see if [REDACTED] has further questions.

21 BY [REDACTED]

22 Q Yeah. So, in the kind of leadup and preparation for January 6th in the  
23 MOSD chats, I wondered what -- like, there's obviously more kind of organization, kind of  
24 command and control being put upon members of the Proud Boys through this leadership  
25 structure in MOSD. And I wondered if there were any conversations about the -- that

1 kind of structural change happening and the Proud Boys and how that would relate to  
2 other organizations that were there on January 6th. So like the Oath Keepers and Three  
3 Percenters identify as militias. There are a lot of messages in the MOSD chats -- or there  
4 are messages in the MOSD chats discussing kind of becoming a militia. And then, on  
5 January 6th, at one point, after Proud Boys had entered the Capitol, there are messages  
6 exchanged where one individual asks, "Are we a militia yet," and Mr. Tarrio responds  
7 "yep" in a voice message.

8 So I just wanted to ask, were there discussions in Proud Boys about militias and  
9 the idea of becoming more like a militia, and what do you recall of those?

10 A I'm sure there were guys that wanted to push for that type of structure.  
11 That wasn't -- I don't believe that was the intent, at least that was -- I was told from the  
12 MOSD. I don't believe that was the intent of the MOSD. It was, again, you know, just  
13 to keep -- keep guys in line and from doing, you know, anything that could get people  
14 hurt or, you know, break the laws.

15 But, as far as like, you know, the comment of Enrique saying, yeah, that they were  
16 a militia, I see that more as a -- I'm not making excuses, but, again, there was a lot of  
17 jokes, you know. I'm sure you've heard some of the voice notes, one about the fleshy  
18 monolist -- or was it mono -- whatever it was. I don't believe at that point Enrique was  
19 like saying: Yes, yes, yes, we're a militia now.

20 I think it was more of a -- like a quick quip in response like, "yep," as a joke.

21 Obviously, looking back at it now, it's not a joke. A lot of things that we did take  
22 as jokes back then are not jokes. But, no, discussions of becoming a militia per se, no,  
23 you know, we were going to remain a fraternity and remain what we were. We  
24 just -- you know, there were some guys that liked to be rally boys, and then there was  
25 party boys, and then there was the guys that liked to do both, rally and party.

1           So, you know, it never would've gone to a full-out militia because nobody  
2 would've allowed it. Like they would've removed Enrique if that's -- you know, if that's  
3 what he said, "Hey, we're going to -- we're just going to be a full-time militia," he  
4 would've been removed.

1

2 [5:11 p.m.]

3 BY [REDACTED]:

4 Q We're going to pull up some of Mr. Tarrío's Parler posts in a second. That's  
5 exhibit 14. So actually we can just work on pulling that up now. But there's a lot of  
6 language in his Parler posts about 1776 and revolutions and identifying people as patriots  
7 and revolutionaries.

8 Is that language to you something specific to the day of January 6th or did you  
9 notice Tarrío using that sort of language more and more as he approached January 6th?

10 I just kind of want to get an understanding of the evolution of the sort of way he  
11 was describing what was going to be happening on the 6th.

12 A I mean, I guess I would have to go back and look at his messages in  
13 succession, but, I mean, for at least 3 years, the guy had historical 1776.shop.

14 Q Right.

15 A He mentioned patriots, he mentioned 1776 a lot. So, I mean, it would be  
16 really hard for me to decipher whether or not, unless I could actually go back and read it  
17 and then make my own call on whether I felt he got more involved or more apt to talk  
18 about 1776 or a revolution than he did before and he always had.

19 Q Okay. Let's look at exhibit 14, page 2. And let's actually scroll down a  
20 little bit. Hold on one second. Sorry. It's actually page 3.

21 So one thing I want to point out, this, if you scroll down second to last message on  
22 the page, it says, "Revolutionaries are now at the Rayburn Building."

23 Do you know what the Rayburn Building is?

24 A I have no idea.

25 Q Okay. So it's one of the House office buildings. There are

1 three House -- well, there are more than three -- but three House office buildings right  
2 next to the Capitol where Members' offices and most staff actually work. And so I'm  
3 kind of interested in Tarrio knowing the name of that building and being able to identify  
4 it.

5 Do you recall from reviewing the portion of the "1776 Returns" document specific  
6 names of buildings other than the Capitol Building being called out?

7 A No, I cannot remember.

8 Q Does it surprise you that Tarrio knows the name of the -- the specific names  
9 of the office buildings around the Capitol?

10 A Is that the actual name or is that like a code name in the document?

11 Q No, that's the actual name. Yeah.

12 A No, it doesn't surprise me. And the reason I say that is, he always seemed  
13 to know where he was going in D.C. I don't know how many times he spent there -- how  
14 much time he spent there, but he always seemed to know where he was going in D.C.  
15 So that doesn't surprise me.

16 Q Okay. Did you talk to him about -- in this post, in particular -- do you know  
17 when he was talking about revolutionaries being in the Rayburn Building?

18 A No. I don't even remember seeing that.

19 Q Okay.

20 A That post.

21 Q Okay. Were you following his Parler posts at all on that day?

22 A I don't -- I can't recall. I mean, I may have been. I'm sure I saw some of  
23 them and I may have -- I may have -- what do they call it back then, echoed, I don't know.  
24 But, again, I can't remember specifically that from that day.

25 Q Okay. Well, I think we can kind of sum up and I'll show a few of these.

1 1776. Revolutionaries are now in the building. There's a photo of the QAnon Shaman  
2 and Tarrio says, "Hero. Proud of your boy." Plus a photo of some Members of  
3 Congress hiding in the gallery. Generally, celebratory posts about what's going on.

4 And I also wanted to draw your attention to a portion of the indictment where it's  
5 in -- I'll just read it to you, and we can pull it up if you'd like to see it. Just let me know.

6 But paragraph 85 of the indictment says, "Shortly after 1:00 p.m., messages were  
7 posted by person 1 and person 2," so that's you and Mr. Aaron Whallon-Wolkind, it says,  
8 "in the New MOSD Leaders Group chat that said, 'Push inside! Find some eggs and  
9 rotten tomatoes!'"

10 And then there's also a post that said, "They deploy the mace yet." And  
11 Donohoe posted, "We are trying."

12 Do you either remember -- apparently one of these, the indictment isn't specific,  
13 but attributes one of those messages to you. Do you remember if you said, "Push  
14 inside! Find some eggs and rotten tomatoes!" Or if you said, "They deploy the mace  
15 yet."

16 A I wouldn't have said rotten tomatoes. I was probably asking did they start  
17 macing people. I don't think I would've said get some rotten tomatoes.

18 Q And by "they," you mean Proud Boys?

19 A No, I meant the police. If I had said that I would have meant, like, "Have  
20 they started macing you guys yet or is it peaceful?" you know, at that point. I don't  
21 know.

22 I mean, again, I'm just -- I'm assuming that that's what I said, but I don't remember  
23 it, and I don't think I would've said anything about rotten tomatoes.

24 Q Okay. And so your celebration -- I think you've explained basically that  
25 your celebration of what was going on or approval that day was because you felt like you



1        hadn't seen the evidence of violence against police or employees or Members of the  
2        House or Senate?

3            A     Yeah. I was pretty much -- I was fed certain things where, like, when I first  
4        tuned in it looked like the cops were just coming off of the stairs beating people. I  
5        mean, I saw what they wanted me to see. I was shown what I needed to be shown to be  
6        angry about it.

7            I didn't know until later that if a patriot or a protester or a cop or whoever threw  
8        the first blow or -- you know what I mean? Like, I don't know.

9            So I don't know when and where it started. All I know is I saw certain parts that  
10       made me think it was one thing versus now seeing the whole thing for what it is.

11          Q     And then when you say you were shown, what do you mean you were  
12       shown? By whom?

13          A     Well, just by the algorithms, the videos that were being shown on Telegram  
14       channels and that sort of thing, yeah.

15          Q     Okay. It sounds like maybe now looking back at that time and your review  
16       of that sort of media and being fed information from the algorithm that you have some  
17       feelings about that or you've changed your opinion about the effect it had on you. Can  
18       you explain that?

19          A     Yeah. I mean, after being able to see everything for what it is and now  
20       seeing this planned stuff, the "1776" document, it's definitely changed my thoughts as far  
21       as what actually happened that day.

22            I pretty much thought it was stupid from the beginning. And at this point now I  
23       think it's -- it was a horrible incident. It was absolutely terrible.

24            People lost their lives, whether on the protester side or on the other side, and  
25       that's -- it's terrible to see people -- something become so real like that when you never

1 thought anything would ever go there when it comes to inside your country. It's scary  
2 to think that our country could have been subject to something like that because you  
3 never know where it could've gone from there.

4 I've always believed in law and order, and for a while, for a little while after I was  
5 stabbed and felt like I wasn't getting justice for my stabbing, I might have been -- I  
6 might've changed my tune a little bit, but at the same time I still believe in law and order.

7 Q And I recognize that we're now going a little bit over the time that I  
8 predicted. I think we'll be done pretty quickly. I've got some general questions. And  
9 then if we could take a 5-minute break, I'm just going to look and make sure that I haven't  
10 forgotten anything and then I think we'll be done relatively soon.

11 So I wanted just in reflecting back on the 6th and tying it to what you just said, I  
12 wonder what your feelings are about President Trump and his actions on that day and  
13 how you view the role he played in the events of January 6th. We can kind of start  
14 generally and I can ask you some more specific questions if that's --

15 A I don't know, you know. At this point, I've actually tried to separate myself  
16 from reading news and reading all this stuff. I've tried my best to stay out of the  
17 political football field. It's become a spectator sport. I'm trying to stay out of it. I  
18 don't want to comment. I don't want to read stuff. I've been trying to stay out of it.

19 It makes my blood pressure boil when I start to read things that I don't want to  
20 read and I don't want to hear about our country.

21 So, I mean, I don't know specifically what his role was. I believe he started a fire  
22 and left -- I think I said this the day after -- he started a fire and left us with the ashes, is  
23 what I said the day -- maybe the day after.

24 Q Yeah, I saw that comment. I was going to ask you about that.

25 In the lead-up to January 6th and the discussion of election integrity and the fraud

1 issues that President Trump repeatedly brought up, do you have -- what are your feelings  
2 now, having more information, having assessed in a different -- from a different  
3 perspective, what are your feelings now about the 2020 election?

4 A I mean, like I said earlier, I accept the election results as they are. I think if  
5 people want a change, they can't force it. They have to vote it in. And that's what  
6 they're going to have to do if they want a change. We can't -- you can't force it and you  
7 can't sit here and complain about it for 4 years. Just deal with it. We go on. And if  
8 you want a change, you got to vote for it. That's the way I feel about it.

9 [REDACTED] Can I follow up on that last point?

10 BY [REDACTED]:

11 Q I think in the interview that you gave to The New York Times a couple  
12 months ago you mentioned that the Proud Boys were looking at running for local office,  
13 trying to make change on a local level.

14 Could you talk a little bit more about that strategy?

15 A I guess that's what a lot of guys were doing across the board, is they were  
16 running for school boards or local offices. They decided that protesting, marching,  
17 doing all that stuff doesn't do anything and the only real way to effect change is through  
18 policy.

19 And the only way you can effect change through policy is go out and run for  
20 something or make sure that the candidate that you want and that has your beliefs wins.  
21 Vote for them and go work on their campaign, that sort of thing.

22 Q So it's more than just supporting candidates that you like, it's Proud Boys  
23 actually running for office?

24 A I would assume so, yeah. I mean, I don't know specifically at this point of  
25 anybody that is or has or still is or planning on it, just because I'm disconnected from

1 most of them. So I wouldn't know at this point. But, yeah, I think that's what they  
2 were talking about doing.

3 Q Got it. Are there particular policy issues or platforms that unite Proud Boy  
4 candidates?

5 A I mean, I would think typically most of the topics that are either  
6 independent, center-viewed politics. I don't know exactly economic stuff.

7 Q You mentioned school boards, for example. Why would Proud Boys want  
8 to run for school boards?

9 A Maybe they feel like the children are getting a little too much information  
10 about certain topics where they shouldn't be. Just let them be kids and not try to force  
11 certain stuff on them at this age. So maybe that's why they were running for school  
12 board. Or COVID mandates or you name it, there's a lot of stuff that they could  
13 probably worry about the kids about.

14 Q What topics?

15 A I'm sorry?

16 Q You said topics generally, but what topics?

17 A Well, like I just said, either COVID or it could be anything. It could be  
18 transsexuals in school. It could be a million things that they want to keep away from,  
19 sex talk to kindergartners, stuff like that, that they would probably agree on that is not a  
20 good thing for kindergartners to hear about.

21 Q Got it.

22 A That's kind of the topics.

23 Q So were you involved in this strategy to have the Proud Boys run at the local  
24 level?

25 A Directly involved, no.

1           Q    I'm just trying to understand because -- and The New York Times will frame  
2 things how it wants to, but they interviewed you and you spoke about this topic. So I'm  
3 wondering why --

4           A    I guess it was kind of the same way that you're kind of approaching me.  
5 They heard through the grapevine that this was happening, this was happening, and I  
6 could basically confirm that I heard through the grapevine that people are going to start  
7 running.

8                So it's kind of like a similar thing, that they came to me like you are and asked  
9 questions about, hey, have you heard anything?

10           Yeah, I've heard of some people that are talking about running and that sort of  
11 thing. But specifics on what platforms they're going to use to run or whatever, I  
12 don't know. And, again, I haven't been involved in it in a while.

13           Q    I wanted to kind of zoom out and ask, in the Proud Boys' membership oath  
14 you make a pledge that you're a Western Chauvinist. Did you take that oath when you  
15 joined?

16           A    Yes.

17           Q    Can you explain what that term means to you?

18           A    What term, the Western Chauvinist?

19           Q    Yeah.

20           A    Okay. So it means that I believe that Western culture is the best culture to  
21 be raised in. And I believe that it fed and built this country up of industry and that sort  
22 of thing.

23                And I think it's -- I mean it's the greatest -- I think -- I believe we live in the greatest  
24 country on Earth. I really do. Even today, I still believe that we live in the greatest  
25 country on Earth, and I don't think it would have been that way without Western men

1 accomplishing what they accomplished years ago, hardworking people who were willing  
2 to sacrifice and almost die to build things.

3 So I think that's what Western culture is to me.

4 Q Got it. And so what is Western culture in your mind?

5 A I mean, Western culture could be described to me as freedom of speech,  
6 having freedoms away from tyrannical governments. It could be just culture -- the  
7 culture of building, inventing, factories. Letting people live above having to live in the  
8 sand or in, I don't know, houses built in the woods out of nothing.

9 It affords people to live like we do and be in suits and have jobs and feed their  
10 family comfortably. I think that's what Western culture embodies for me.

11 Q Got it. Are there particular politicians you think are fellow Western  
12 Chauvinists?

13 A Right now I don't know. Again, I don't know who's running, who's not. I  
14 don't know who else would be at this point.

15 Q Do you think Donald Trump is a Western Chauvinist?

16 A I don't know what Donald Trump is, to be honest with you. Is he a -- is he  
17 the biggest shyster I've ever seen? I don't know. Is he true to what he's saying? I  
18 don't know. There's no way to know what that man feels in his heart.

19 But I believe some of the policies that he was trying to put in place may have been  
20 geared towards, obviously, what we were -- what we feel is the right values for this  
21 country to be ran on. So that's why most Proud Boys supported it and supported his  
22 candidacy.

23 Q Got it. I think Enrique Tarrio thinks that Trump is a Western Chauvinist and  
24 you said that Trump agrees with kind of the value system that you outlined.

25 A He says he does.

1 Q I'm sorry?

2 A He says he does.

3 Q Got it. Okay. So you think that's the basis on which most Proud Boys  
4 support him?

5 A I think most Proud Boys -- I mean, I don't know. I can't speak for other  
6 people. But I know that I guess it would be because, if you looked at the state of the  
7 country and the business deals that were being made and the rise in jobs and people  
8 were making lots of money and this and that, I guess that's probably why they were  
9 supporting it, because times were pretty good at that point. Low gas prices, stuff like  
10 that, that really affected us on a daily basis.

11 Q Got it.

12 A At this point, I could care what anybody does, what their policies are as far  
13 as anything social. I just want our infrastructure and our economy fixed. That's all I  
14 care. I want to feed my family comfortably.

15 [REDACTED] Got it.

16 [REDACTED]

17 BY [REDACTED]

18 Q Yeah, I have some follow-up questions. I want to jump around a little bit,  
19 so forgive me, but we're almost done.

20 All right. I wanted to check with you on one other name of a potential girlfriend  
21 or interest of Mr. Tarrio's.

22 Do you know Kristen Chicarello or Chicharello?

23 A Huh-uh. You have, like, a Telegram screen name or anything?

24 Q No, I don't. Just the actual name.

25 A No. I've never heard of that person.

1           Q    It sounds like at the time you had mentioned earlier that you were  
2 communicating with a lot of women through Telegram. Was that the same case for Mr.  
3 Tarrio, it was used kind of like a social media or way to meet new people, including some  
4 of Tarrio's girlfriends?

5           A    I'm sure that's where he was meeting a lot of his girlfriends, yeah.

6           Q    We talked a little bit about fundraisers earlier. I wanted to pull up quickly  
7 exhibit 11. And this is -- as we're pulling it up, I'll just tell you, it's a post by Mr. Stone  
8 around December 30th. He writes about a fundraiser that he's starting particularly for  
9 security and protective equipment for January 6th. And he particularly references  
10 violence by BLM and antifa on November 14th as sort of one of the motivating factors  
11 behind him doing this fundraiser.

12               And I think it's being pulled up. But, frankly, after that discussion, we probably  
13 don't need to look at the document. But that is to say, Mr. Stone did a fundraiser on  
14 December 30th.

15               Do you remember ever hearing about this fundraiser or do you know if it was  
16 connected to the Proud Boys at all?

17           A    I had no idea, to be honest with you. I don't know. I don't know if it was  
18 for him or for maybe his people that might have been there with him. I don't know.

19           Q    Okay. And then I'll ask you, in March of 2021 The New York Times reported  
20 that a Proud Boy was in contact with the White House leading up to January 6th and  
21 about the events of January 5th and 6th.

22               Do you recall that reporting or do you know who might have been in contact with  
23 the White House?

24           A    No. I would think that maybe they're running with the fact that Enrique  
25 went to the White House. I mean, that's the only --



1           Q    This was actually a phone call identified between a Proud Boy and a member  
2   of the White House -- or staff from the White House.

3           A    Like a White House staff?   Yeah.   No.   I have no idea.

4           Q    Okay.   And I wanted to quickly ask you about Mr. Tarrio's arrest on the 4th.  
5   We've kind of talked about some peripheral issues.   But knowing what you know now  
6   and the things we've discussed and the things you've discussed with DOJ and FBI, there's  
7   speculation that Mr. Tarrio might have intended to be unavailable to be in D.C. on  
8   January 6th.

9           Do you have any thoughts about that or whether or not he --

10          A    I think that's a lot of speculation and conspiracy stuff, because I don't think  
11   he was -- I don't think he's the type of guy that would go in there and especially carrying  
12   those two magazines that he was carrying that he wasn't supposed to be carrying in D.C.  
13   That was like a stupid mistake on his part.

14          But I don't think that he would've planned that elaborately to get arrested unless  
15   the FBI had something to do with it or the police, the Capitol Police had something to do  
16   with it and just wanted to take him off the street to get out of it.

17          That's the only thing I could think of.   I don't think he would've done that  
18   intentionally.   I think he would've -- if Enrique could have been there, he would have  
19   been there.

20          Q    Okay.   And then if we could quickly address after the 6th.   Do you know,  
21   did you kind of follow Mr. Tarrio's journey back to Florida, or do you know how he got  
22   back to Florida?

23          A    I don't remember -- I don't remember specifically.

24          Q    So he drove -- or I'll represent to you that he drove with Ms. Harris back to  
25   Florida.

1           A    Okay.

2           Q    And we've seen indications that at some point during that trip or in advance  
3 of that trip you had invited him to come to North Carolina or to stop in North Carolina --

4           A    Yes.

5           Q    -- on the way down.   Do you recall that?

6           A    Yeah, he didn't.

7           Q    Okay.

8           A    He drove right through.

9           Q    And I think you might've even suggested that after he was arrested and  
10 released and told that he couldn't come back into D.C., that you had recommended he  
11 just come to North Carolina.   Do you recall that?

12          A    Yeah.   I told him, I said, you can come down here if you need to.   I didn't  
13 know what his situation was up there.   So I told him, yeah, you can come down here if  
14 you need to.   I was going to offer him a place to stay if need be.

15          Q    Yeah.   And do you have a sense of or do you have an opinion about why he  
16 didn't come to North Carolina and instead stayed in the area?

17          A    No, other than he wanted to be probably close to what was going on,  
18 wanted to be close to the area.   And that would be speculation for me, I mean.

19          Q    Okay.   And then just kind of as a final question, and we ask this to all folks  
20 that we talk to that have talked to DOJ or FBI.

21               Is there anything that you covered with DOJ and FBI that we haven't covered here  
22 today?

23          A    We covered a lot, so I think we went over more with you.   But specifics I  
24 can't remember unless -- yeah.   I mean, unintentionally, if I'm not being honest, I just  
25 don't remember.

1 Q Yeah.

2 A It's a lot of information. My brain's fried right now.

3 Q Mr. Wellborn can help you if he's inclined to do so.

4 But just general, big topics, major topics, is there anything -- I mean, the real  
5 question just being, is there something that we've missed that you think that we should  
6 discuss today?

7 Mr. Wellborn. Well, you say missed that we should discuss. I guess that would  
8 invite me to speculate what you're interested in.

9 There was probably more background on Proud Boy -- what Jeremy refers to as  
10 Proud Boy lore or how each chapter worked and how kind of dysfunctional and  
11 anarchistic it was and a couple of talks about, years before all this whole thing kicked off,  
12 about their quote, "conventions," for lack of a better term, in Las Vegas and how sort of  
13 silly and dysfunctional those were.

14 There was a lot of talk about how they came up with these stupid names, he  
15 presented some of them, and about some of the even stupider names that people used  
16 that sort of, I would say, segued into the area of being farcical.

17 But beyond that, I can't think of anything specific.

18 BY [REDACTED]:

19 Q Okay.

20 A Yeah. That's pretty much all the stuff, that I would agree.

21 Q All right. Well, anything as we finish today? I know you've spent all day  
22 with us and I appreciate your time. Anything that you personally want to say or  
23 anything you want us to hear?

24 We've covered a lot today, I know, some kind of significant moments in your life,  
25 obviously. And I just want to give you an opportunity to state anything that you didn't

1       feel like you got the opportunity to state today.

2               A     No.   As far as me, I'm just -- I'm not interested in any of that stuff anymore.  
3     I just -- I'm not.   I'm trying to steer clear of it.   I have no interest in -- like I said, it's  
4     turned into a spectator sport that I want no part of.   I just, at this point, I just hope for  
5     the best, pray for the best outcome for everyone, and -- yeah.

6               And just an apology to you, [REDACTED], if I was -- sounded like an asshole to you on  
7     the phone when we spoke.   I kind of was.   So just an apology to you for that.   And,  
8     yeah, that's about it.

9               Q     I wouldn't be excited about somebody calling me to tell me that they are  
10    being served with a subpoena either.

11              A     Yeah.   So I think you can understand where I was coming from.

12              [REDACTED]   Okay.   Great.   Then I think with that, we can go off the record, and  
13    we'll put the deposition in recess at 5:41.

14              [Whereupon, at 5:41 p.m., the deposition was adjourned, subject to the call of the  
15    chair.]

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Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

\_\_\_\_\_

Witness Name

\_\_\_\_\_

Date